

PTE 1 (07/13/2021 training certificate)



ATTENDANCE CERTIFICATE

Training: *Diversity & Harassment Classroom*
Date of Attendance: 07/13, 2021
Facilitator/Instructor: **Judy Talis**
Method of Delivery: **Microsoft Teams**

Name of Attendee:	Assata Acey
	<i>Check Sessions Attended:</i>
2.0 Hours	<input checked="checked" type="checkbox"/> Diversity & Harassment Classroom <i>(All Must Attend)</i>
1.0 Hours	<input type="checkbox"/> Supervisor Training <i>(Additional Training for all Supervisors)</i>

I confirm that, on the date noted above, I attended the training sessions checked above.

Signature: *Assata A Acey*

Date: 07/14/2021



Attendance Certificate (2021).pdf

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Requested:

Jul 13, 2021, 10:40 AM EDT (Jul 13, 2021, 2:40 PM UTC)

Diana Wilmes (diana.wilmes@momentumdynamics.com)

IP: 71.162.243.94

Signed:

Jul 14, 2021, 12:42 PM EDT (Jul 14, 2021, 4:42 PM UTC)

Assata Acey (Assata.Acey@momentumdynamics.com)

IP: 50.78.131.36

PTE 2 (07/16/2021 Teams Messages between myself and my Supervisor, Doc 40 transcript (I)(1), *originals filed in Doc 40-2 pp. 1-20*).

1. 07/16/2021 Excited utterance (made by myself) and reputation concerning character statements (from my supervisor) about sexual undertones in (then principal engineer--now Electrical Engineering Manager) Bogdan Proca's behavior (Ex. 1-10). References ECF 8-1(¶25, ¶180-183), ECF-15 (¶79).

2:58:17 PM Assata: Peripherally, Bogden does creep me out a bit. There've been other one time comments made by others in poor taste, but its giving a different gut feeling(that could still be wrong) I will stay tuned to see if it becomes a pattern or if it plateaus out.

3:00:31 PM Joren: Agree on the creep part, but if it's ever malicious or an issue, please feel free to talk to me, and / or HR.

3:05:47 PM Assata: I won't lie, the question/comments during harassment training about whether its ok to date a subordinate and how "natural" it is has me on edge. Or asking during icecream if I still run track and then getting curt that I didn't have the expected answer? Will keep you posted.

3:13:07 PM Joren: You were in training with him?

3:14:06 PM Assata: yes, I had training with Him, Fran, Chris and Brenda since its once a month


3:14:10 PM Joren: That's kind of concerning...

3:15:48 PM Assata: I don't know if Judy noticed the direction of his comments in training. He and Fran had the most resistance to training, but I think Fran's was more politically inclined, and he seems to have no vendetta to treat anyone weird.

3:16:27 PM Assata: He's just on my radar as possibly extra creepy. But wanted to give a heads up in case I notice a pattern later

3:17:59 PM Joren: Thanks for letting me know. Please feel welcome to continue bringing this up if it continues, that's unacceptable, and not going to be stood for.

4:27:15 PM Joren: Please note -1 am taking this information very seriously. Please do not hesitate to reach out to me if anything further comes up, no matter how small. You matter as a person, and by default, deserve to be in an environment where you are able to focus on work without having other things distracting you, let alone anything further. Also please certainly let me know if there is any way / any thing I, or others, can do to assist.



PTE 3 (07/19/2021 Teams Messages between myself and my Supervisor, Doc 40 Transcript (I)(2), *originals filed in Doc 40-2 pp.21-26*).


2. 07/19/2021 Excited utterance and recorded recollection from myself to my supervisor (Joren Wendschuh) regarding sexual undertones in Bogdan Proca's behavior. (Exhibits 11-13). References ECF 8-1 (¶125(a)-(b)), ¶184, ECF 15 (¶79).

9:06:05 PM Assata: ok retyping... On my way home friday, I mentally flagged another statement that I had blocked out. During icecream, i had asked chis what flavor he got, to which he said "chocolate. I'm a simple man." I then turned and asked the folks behind and to the left of us what flavor they got/was it the same. Bogdan who was closest, responded that he was getting "dark chocolate, if they have it." before proceeding into his track questions. Im not sure about the statement, when chris subsequently went in I [assumed] it was the sun, and it may have been. But I've also never hear anyone order dark choc[o]late ice cream. Regardless, after a full weekend, I definitely feel like there isnt too much overlap where ill have to seen Bogdan often. I'm probabl[y] going to politely avoid him

1:22:39 PM Joren: Assata Acey - Want to be clear here - is there anything you are asking / wanting me to do with the information about Bogden?

1:37:54 PM Assata: To be clear, not really. I'm just keeping an open log as things occur so that 1. You know of the situation, behind the scenes- which lowers stress of explaining wanting to avoid being around him too much and further lowers the unlikely chance of you accidentally place us together[or insert awkward or otherwise avoidable exchange here] unless important. 2. If it gets to be a pattern/ Or a bigger issue, you will know. 3. If it becomes a pattern and I'm too confused to figure that out, theres another set of eyes. The message this morning was me wanting to

make sure I expressed all of what from yester-workday(friday). My current status with interactions is to avoid, since I dont interact with him often. Although I have caught him staring a bit., and watching me during my morning chat with Tina? Honestly hes getting close but not quite an issue yet, and idk what time frame is best for these updates(weekly or not) and I'm hoping he stops. But also if he says anything else[blatantly] weird, then I'd probably raise a flag
jic

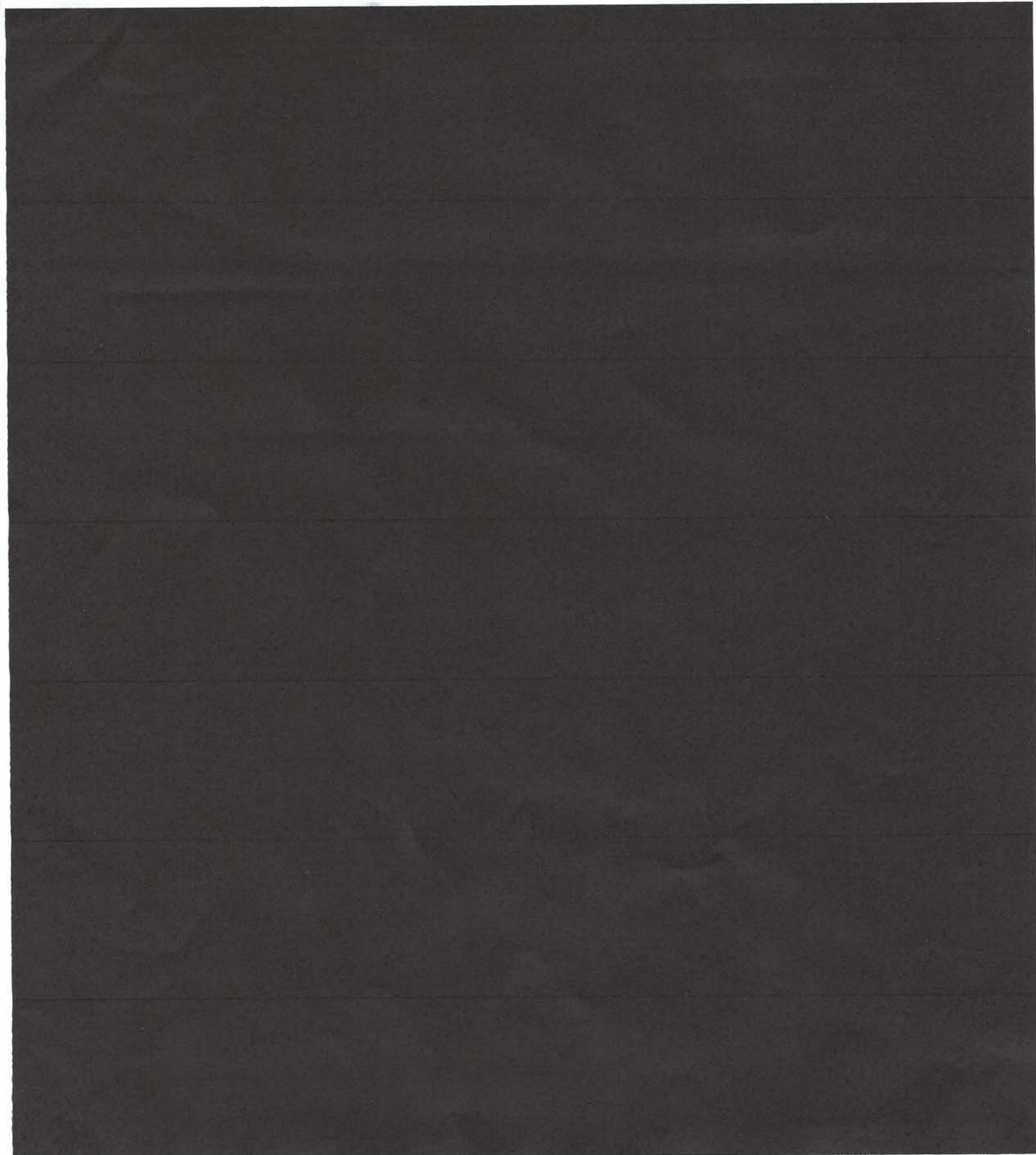


**PTE 4 (04/11/2024 A. Acey Dep. Transcript,
pp. 272 (ll24)-274).**

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1 Ms. Talis at your 90-day check-in afterwards?

2 A. So she asked me how I was doing,
3 and I took the opportunity to brag about my
4 boss.

5 And I was saying, "Oh, you know,
6 like, I tell him when people are harassing
7 me, and he's been very supportive."

8 She asked for examples of something
9 that, I guess, she felt she could help with,
10 and I told her about Bogdan, and for me she
11 failed that test. She -- she totally just --
12 it just wasn't -- I don't know.

13 I told her about the comments in
14 orientation, how they made me feel. I told
15 her the company gives free ice cream on
16 certain days, about Bogdan's comments in
17 front of the ice cream truck.

18 I told her --

19 Q. What comment is that?

20 A. He had said a couple things, but, I
21 mean, he just came near me at a respectful
22 distance, and he -- like, we were stand- --
23 the truck was here, opening there, and we
24 were standing, like, this side of truck.

1 And he asked about, you know,
2 whether I run, and I was excited. I was,
3 like, "Well, you know, not" -- "not as much."

4 But I -- you know, I thought it was
5 a fun conversation, but when he found out
6 that I didn't run, he looked -- he started
7 frowning, almost in a cartoonish way, but I
8 guess he wasn't happy. And I guess the topic
9 of ice cream came up and he was looking at me
10 and he mentioned dark chocolate.

11 The exact words he stated were
12 probably more accurately recounted to my
13 boss, I believe, like, a day or two after we
14 had teams, but I can't remember his direct
15 quotes right now.

16 Q. When you say you shared his comment
17 that bothered you with your boss, do you
18 know, did Joren speak with Bogdan?

19 A. No. He just said it was weird, and
20 that he had noticed a creepy vibe from him
21 before. And we agreed that if it ever came
22 up for me to have to work with Bogdan or be
23 in the same room, he would support me keeping
24 a healthy distance.

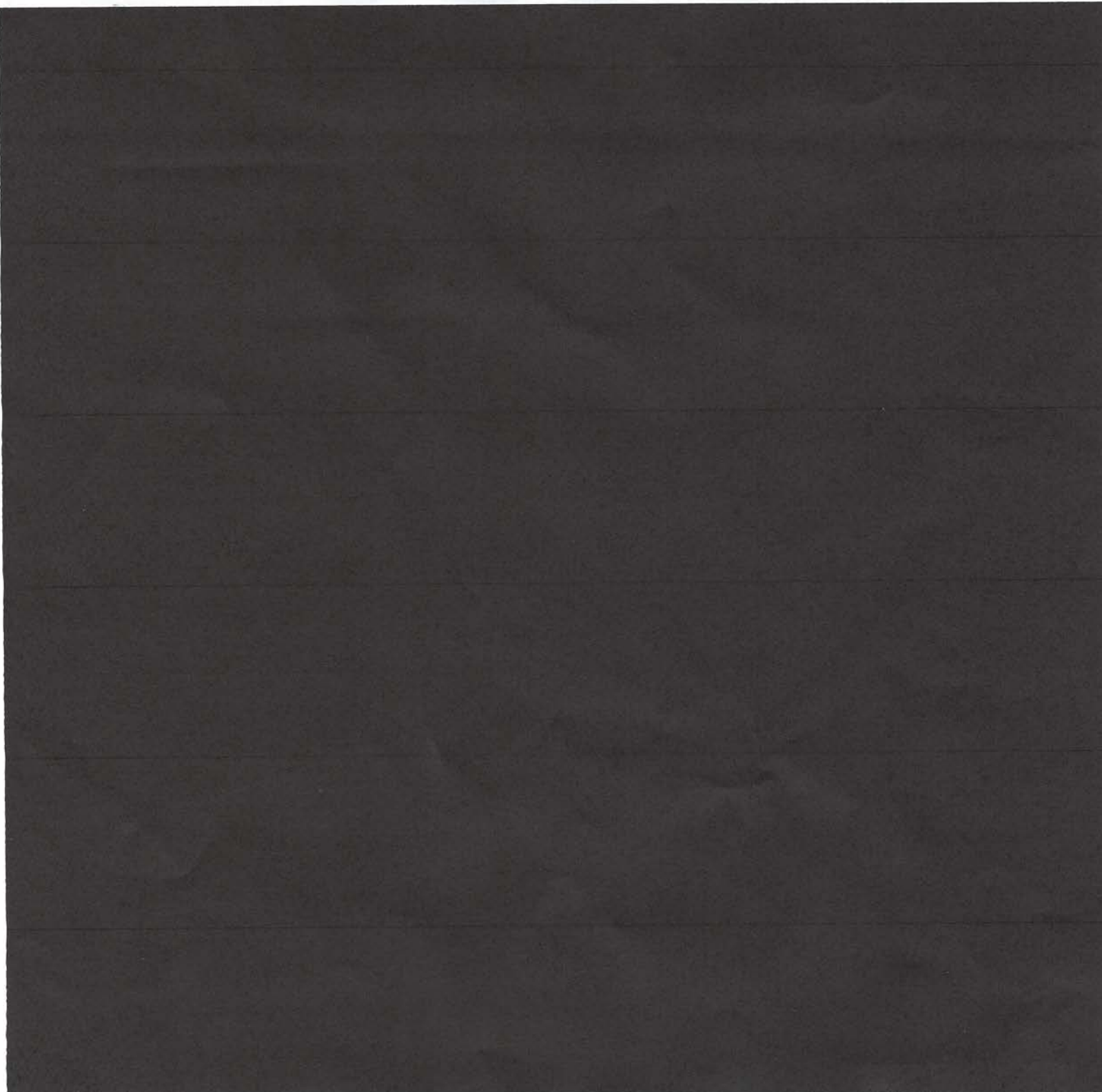
**PTE 5 (04/11/2024 A. Acey Dep. Transcript,
pp. 290(1121)- 292).**

22 You said that you felt that there were racist
23 people at the company. You mentioned --
24 you -- I guess, the ice cream with Bogdan?

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1 A. I thought that was weird. I think
2 the judge pointed that out as racism because
3 it was dark chocolate. I just thought it was
4 sexual harassment because I'm dark skinned.
5 I mean, he wasn't calling me like do-do, so I
6 didn't feel, like, he was being degrading
7 or -- I can understand sexing blackness, but
8 I felt like it he was more so sexualizing my
9 body than my race.

10 Q. Well, this -- this happened that
11 there was an ice cream truck in the parking
12 lot at InductEV?

13 A. Yes. So that one of the -- one of
14 the things I loved about the company was --
15 and one of the things they always talked
16 about was they would pick one day a week
17 where they would have ice cream. There's
18 this guy, a contractor -- a lot of people
19 felt strongly about who provided the ice
20 cream.

21 But there was this guy, and he
22 would come and he would announce, "All right.
23 Everyone, it's ice cream time."

24 I was so excited for this ice

1 cream. And I'd ask people what flavor
2 they're going to get. Oh that's probably why
3 he -- yeah.

4 Anyway, I would ask people what
5 flavor they were going to get. And -- and I
6 just thought it was a nice place to say hi to
7 people at work. And Bogdan kind of -- I
8 wouldn't say he ruined that for me, but in
9 that moment he put a damper on it.

10 Q. Were there other people when he
11 made the comment, was it out at the truck? I
12 mean, where did it happen?

13 A. It was out at the truck. Everybody
14 came out, even the VPs would come out. And,
15 I mean, there's this guy named Chris Shotz.
16 He was a recent field technician. I was
17 really fond of Chris Shotz. And I believe I
18 was trying to, like, interact with him, as
19 far as, like, "Hey, how are you," like,
20 "How's it" -- and Bogdan approached.

21 And I mean, if you're going to
22 stare, you might as well talk, and I asked
23 him -- you know, I don't even know. I'm
24 trying to -- I don't want to piecework things

PTE 6 (07/28/2021 Teams Messages between myself and my Supervisor, Doc 40 Transcript (I)(3), *originals filed in Doc 40-2 pp. 27-34*).

3. 07/28/2021 Excited utterance from myself to my supervisor about escalated concerns about Bogdan Proca's sexual behavior.

(Ex. 14-17). References ECF 8-1 (¶25(c), ¶184), ECF 15 (¶79).

[*Preceding Messages not Produced*]

5:57:02 PM Assata: Yw! I knew what you meant but others may not. In other stories, Bogdan heard me singing in back [o]f lab and walked across stuff/around table to me and asked if we were the last two people in the building... I just kept walking and pointed him towards the gold car person he asked me to take him there but eventually found the door. Probably benign but jic

5:59:45 PM Joren: Understood. Thanks. Gold car person == Ron Turi! [shrunk image]

6:02:27 PM Joren: You're out of the building, right?

6:02:32 PM Assata: Yes

**PTE 7 (04/11/2024 A. Acey Dep. Transcript,
pp. 278(l13)-282(l110)).**

4 incidences that you remember where he made
5 you to feel uncomfortable, or you thought his
6 behavior was weird?

7 A. Yes. I think we just -- I think we
8 briefly discussed the -- the after-hours lab
9 thing with him. I don't remember.

10 Q. Tell me about that. I've seen it
11 in the papers, so...

12 A. Yeah. So I was working late. If
13 you remember that map you showed me of the --
14 the area, like, closer to the back of the
15 lab, closer to the back, away from the garage
16 door, and all the way against the other wall,
17 and I was -- like, there's this big old table
18 with all these things on it -- because it's
19 usually Seth's area where they keep things
20 for the ground assembly, those big
21 rectangular things where they build them and
22 put the ferrite. And I think I was just
23 going to get a tool or something, and Bogdan
24 kind of comes from the other side of that

1 room, which is, like, out the back of what
2 would be Andy's office where that gets into
3 some of those rooms, and he -- from across
4 that room he asked if we're the only people
5 there.

6 I thought, "Okay. Well" -- I'm
7 sorry, I don't remember if that was his first
8 question. I just know it was a question that
9 he asked in -- during that exchange.

10 Do you want me to circle on here?

11 Q. Yeah. Could you get Exhibit.

12 AA-17 --

13 A. I have it.

14 Q. -- and put a circle with a "B" as
15 to where Bogdan was.

16 A. Okay. I was out here --
17 (Witness complies.)

18 Q. -- to your recollection?

19 A. So Bogdan started off here.

20 Q. And where -- where -- where -- were
21 you in essentially the same spot the whole
22 time during this episode?

23 A. I was originally here (Witness
24 indicating) and --

1 Q. What letter did you use?

2 A. I just used an "A" for Assata.

3 Q. That makes sense. Good enough.

4 A. There was a table, like, around
5 there (Witness indicating) --

6 Q. Oh, okay.

7 A. So I didn't mark -- I just tried to
8 gesture where it is.

9 So Bogdan calls out to me from
10 here, and he starts with some type of
11 question. I know that he eventually asked me
12 if we were the only people there, but I can't
13 remember if the first question was about Ron.

14 Ron's a contractor. He stays there
15 late. I mean, not a cont- -- yeah, he's a
16 contractor, doing work for the company, used
17 the space, stays there late, and a lot of
18 times they let Ron lock up last. So that's
19 why it would be relevant.

20 But, regardless, I responded to
21 him.

22 Q. What did you say?

23 A. I don't remember what his first
24 question was. I only know the response when

1 he asked me if we were the only people there.
2 I didn't know the answer, but I lied --
3 because I didn't know the answer to be true,
4 and I told him that Ron was still there
5 because at that point I was uncomfortable
6 because he was coming around the table to get
7 closer to me, and I couldn't understand
8 because the table was only this wide (Witness
9 indicating). He could have spoken to me from
10 this side.

11 But I -- I didn't like the idea of
12 him -- what's the word -- approaching me
13 physically when he was already able to hear
14 me in reference to whether we were alone,
15 given his history with me. And as he moved
16 around, I kind of backed up further.

17 Q. Well, when you -- what was the --
18 what happened, did you -- were you going back
19 to your office or?

20 A. I left immediately, and I texted my
21 boss what happened and confirmed to him that
22 I had left -- made it out the building, as he
23 asked me if I did make it out.

24 Q. Now, I'm going to take a guess

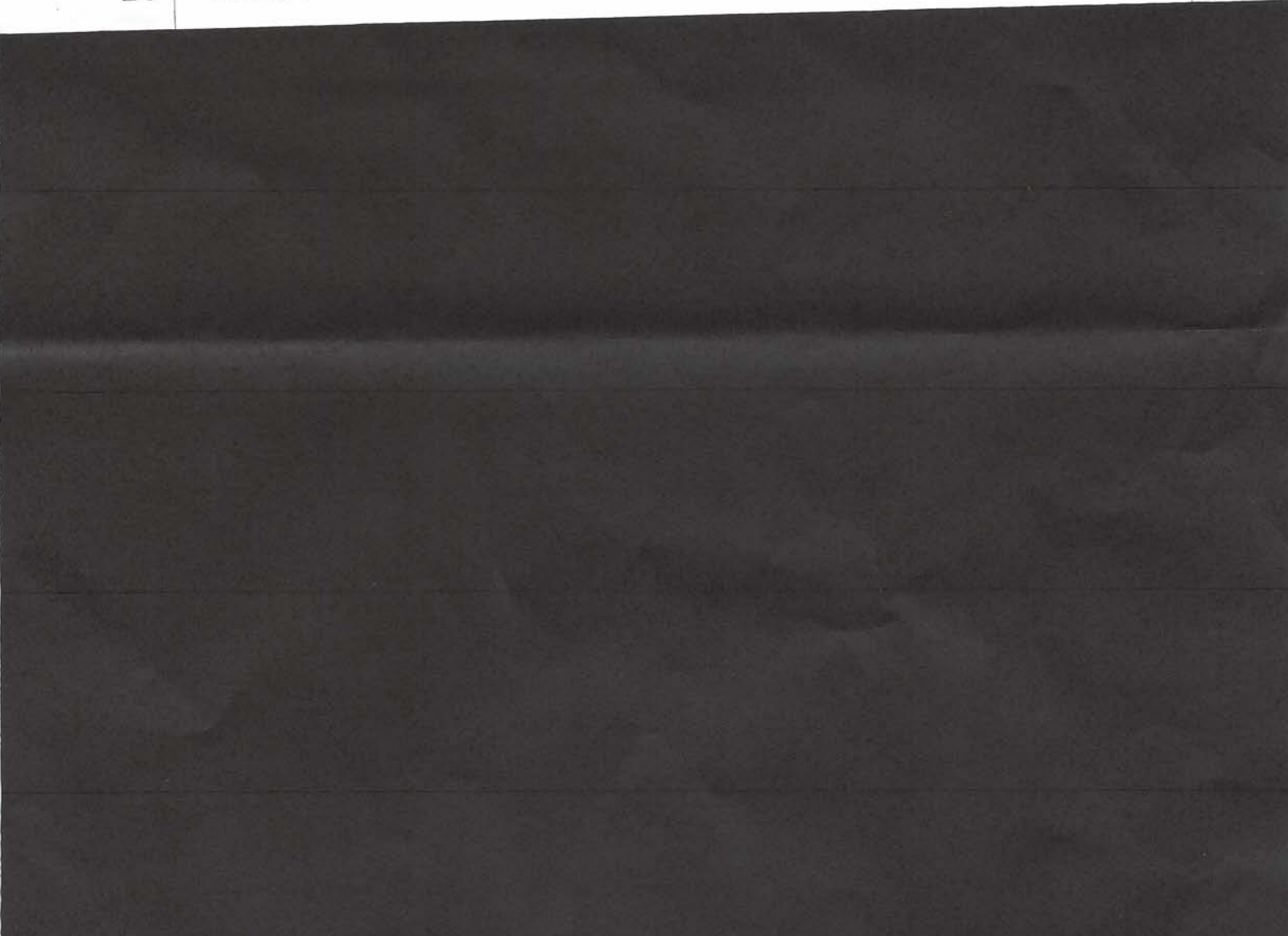
1 here. I'm going to show a picture.

2 Is this the table that you're
3 talking about?

4 A. No that looks like the meeting room
5 table that's closer to the garage.

6 Q. Okay. Then don't worry about it.
7 When approximately did this occur
8 in your employment there?

9 A. It had to occur towards the end of
10 2021. I don't recall it happening in 2022.



PTE 8a (03/27/2024 J. Acey Dep. pp. 57-63).

10 Before the mediation, before any
11 of this started, did she ever talk to you about
12 her employment with Momentum?

13 A. She, at first, she was very happy
14 to be there and she had a boss that she liked and
15 he seemed to be in her corner. There was -- she
16 did talk sometimes about -- I believe she did
17 mention being chased around the lab or something
18 like that. That's all.

19 Just in general, things that you
20 would talk about, nothing as -- and that she -- so
21 she would take work home and she liked to work.

22 She enjoyed it and she got -- she
23 seemed to get along with a lot of her co-workers,
24 not all of them. I guess not the ones that chased

1 her around the lab.

2 Q. Can you explain a bit more? What
3 do you mean when you say chased around?

4 A. No. That's what she told me and
5 I'm just repeating what she said. I wasn't there,
6 so I don't know.

7 Q. Did she ever explain what she meant
8 by chased around?

9 A. She was being harassed is what she
10 meant.

11 Q. How do you know that's what she
12 meant?

13 A. Because she didn't like it, she
14 thought it was not -- that it was not something
15 that should happen at work.

16 Q. When you say it, what was it that
17 she was telling you?

18 A. Being chased around the lab.

19 Q. Can you be a bit more specific?

20 A. No, because I don't know more than
21 that.

22 Q. She didn't tell you what she meant
23 by chased around?

24 A. No, and I didn't go into it. I

1 just knew she was unhappy about it and it's
2 another case where she was talking to me about
3 things she needed to talk about and I was there to
4 listen.

5 Q. I understand that, but when she
6 said -- did she use those words chased around or
7 did she use some other words that describe it?

8 A. I think she used -- I'm pretty
9 certain she used those words as much as I can
10 recall.

11 Q. Okay. It's your testimony today
12 that she didn't explain what was going on, just
13 that she was being chased around?

14 A. I didn't ask her to go into it.
15 That's all. I was just there, as I said, to
16 listen, so I listened to what was going on.

17 Q. Understood. I'm not asking whether
18 you asked her. My question is more specific.

19 It's did she explain what she
20 meant by being chased around; in other words, did
21 she give any additional details about what was
22 going on that she did not like at work with
23 respect --

24 A. No.

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1 Q. Okay --

2 A. She may have said it in passing and
3 talking about work, so no.

4 Q. That instance where she was being,
5 quote, chased around, do you recall when she told
6 you about that?

7 A. No, I don't.

8 Q. Do you recall when that occurred?

9 A. No.

10 Q. Do you know whether -- do you know
11 who she was being chased around by?

12 A. No. I don't even know the people
13 she was working with.

14 Q. Did she tell you who?

15 A. She may have, but I don't know. I
16 don't -- I didn't retain that information if she
17 did. I don't think she did.

18 Q. So she may have, but it's your
19 testimony that you can't remember?

20 A. I don't think -- I don't know if
21 she did or not. I really don't remember. As I
22 said, most of the time when she talked to me, I
23 listened to her.

24 The only reason I knew Judy's name

1 is because she talked about her a lot. She had a
2 lot to do with this case. I don't know any other
3 names.

4 I know she had a manager that she
5 liked and that seemed to be in her corner and I
6 don't even know his name.

7 Q. Were you concerned at all when she
8 told you she was being chased around the lab?

9 A. I'm concern -- I'm always concerned
10 when she is unhappy.

11 Q. That's fair. But that's not --
12 that's not really -- that doesn't really answer
13 the question.

14 So did you have -- when Plaintiff
15 told you that she was being chased around, did you
16 have concerns about who was chasing her around?

17 A. No.

18 Q. Do you know whether the Plaintiff
19 ever reported that occurrence?

20 A. No.

21 Q. And never gave you any specific
22 details about what she meant by being chased
23 around?

24 A. No.

1 Q. And you never thought to ask?

2 A. No.

3 Q. Did the Plaintiff share any other
4 concerns with you?

5 A. She shared the concern about the
6 cell phone and having to -- having to be charged
7 for time that she took when she was sick and all
8 of those were in passing.

9 There's things that she talked
10 about, but I didn't take notes or anything like
11 that. I don't remember. I just I don't remember
12 exactly what happened. I just remember those
13 things occurred.

14 I remember when she first started
15 working there she was happy and as time progressed
16 -- she was happy about working there; and as time
17 progressed, she became unhappy.

18 Q. And as time went on and she became
19 unhappy, she --

20 A. Things were happening that made her
21 unhappy, yes.

22 Q. And she shared those concerns with
23 you, right?

24 A. In pass -- when she called to talk,

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1 just as I was saying, I mean.

2 Q. I understand. One of which was
3 being chased around the lab, right?

4 A. Yes.



**PTE 8b (03/27/2024 J. Acey Dep. pp. 78-80,
87-93).**

11 Are you aware of any other motive
12 of being like chased around a lab? Are you aware
13 of any other interpretations that you would have
14 to those words?

15 MR. LONGO: Objection to the form
16 of the question. You can answer.

17 THE WITNESS: I'm sorry. I can
18 answer?

19 MR. LONGO: Yes.

20 BY MS. ACEY:

21 Q. Our understanding is that the
22 objections will come out, but you generally would
23 be answering the questions.

24 A. Okay. If I was being chased around

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1 a lab, I would presume that's sexual harassment.

2 Q. Well, if I'm telling -- if someone
3 tells you they're being chased around the lab,
4 what do you visualize? When I told you I was
5 being chased around the lab, what did you
6 visualize occurring?

7 A. I visualized someone trying to
8 interact with you physically that you did not want
9 to interact with you physically.

10 Q. At the time of that communication,
11 was I still in the lab or was I re -- at the time
12 of that communication, did I appear to you to be
13 in distress or in fear?

14 MR. LONGO: Objection to the form
15 of the question. You can answer.

16 THE WITNESS: I don't remember.

17 BY MS. ACEY HACKMAN:

18 Q. Do I often call you during these
19 events when I complain about -- did I often call
20 you while at work to complain about events at
21 work?

22 A. No, not that I can recall.

23 Q. Do I tell you things usually while
24 they're happening or after they happen?

1 A. After they happen.

2 MR. LONGO: Objection.

3 BY MR. LONGO:

4 Q. The problems that I have brought to
5 you about my job at Momentum, have you felt that
6 you were able to solve them?

7 A. No.

8 Q. Did you believe that there was
9 anything that you could do to prevent people from
10 chasing me at my job?

11 A. No.



12

13

BY MR. LONGO:

14

15

16

17

Q. Ms. Acey, you testified earlier that you didn't recall any specific details of the circumstances that you described as being chased around, correct?

18

A. Yes.

19

20

21

Q. And you testified just a minute ago that you would have described that experience being chased around as sexual harassment, right?

22

A. If it were to happen to me, yes.

23

24

Q. You would agree with me that -- let me back up.

1 A. If I'm -- go ahead. I'm sorry.

2 Q. You don't remember a specific date
3 Plaintiff told you about being chased around,
4 right?

5 A. That's right.

6 Q. You don't remember any details
7 about Plaintiff being chased around, right?

8 A. That's right.

9 Q. You don't know whether the
10 Plaintiff was being chased around by a man or a
11 woman, right?

12 A. No. It was a man.

13 Q. That's not what you testified to
14 earlier; is it?

15 A. I said she was being chased
16 around. I didn't say whether it was a man or a
17 woman. It was a man.

18 Q. Okay. So other than the detail
19 that it was a man, do you have any other
20 information about that incident being chased
21 around?

22 A. I knew that she didn't want to be
23 chased around.

24 Q. Not my question. Do you have any

1 other specific information relating to that
2 experience other than the fact that she was chased
3 around by a man?

4 A. With that exact experience, no, I
5 don't have any other information.

6 Q. You don't know the name of the
7 person?

8 A. I don't know any names, except Dan
9 and Judy.

10 Q. You don't know where that happened
11 within the company?

12 A. In the lab, she said.

13 Q. You don't know which lab; do you?

14 A. I would not know. I have no idea.

15 Q. So it's fair to say other than the
16 fact she was chased around by a man, you have no
17 additional details regarding that experience,
18 right?

19 A. That's right.

20 Q. Give me one minute to review my
21 notes.

22 When Plaintiff told you she was
23 chased, did you ask her what she meant?

24 A. No. I assumed what she meant.

1 Q. Why did you assume what she meant?

2 A. Because she was upset about it, she
3 didn't want to be chased.

4 Q. You didn't think to ask what she
5 meant by chased around?

6 A. No. Would you?

7 Q. I would, yes. But you did not?

8 A. I didn't. It wasn't something that
9 she wanted to happen that she enjoyed that it
10 happened. She was upset about it.

11 Q. And you testified earlier that you
12 weren't -- when she told you she was being chased
13 around, you weren't concerned, right? That was
14 your testimony?

15 A. I didn't say that.

16 Q. We'll have a transcript. I believe
17 that's what you testified to.

18 A. I'm sorry?

19 Q. We'll have the transcript and see
20 what you testified to.

21 A. I'm sure I didn't say I wasn't
22 concerned.

23 Q. But you didn't ask any questions
24 about what Plaintiff was telling you; did you?

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1 A. That's what I said.

2 Q. What is what you said?

3 A. I didn't ask any questions about
4 it. I didn't say I wasn't concerned.

5 Q. All right. I may be --

6 A. Surmised.

7 Q. Excuse me?

8 A. You surmised?

9 Q. No. I may be misremembering your
10 testimony, but we'll see what the transcript
11 says.

12 A. Okay.

13 Q. Did Plaintiff ever mention to you
14 during that incident that she believed this person
15 wanted to physically interact with her?

16 A. That's what I believed she was
17 saying.

18 Q. But she never mentioned that,
19 right?

20 A. If you're being chased around a lab
21 and you complain about it, I would assume that
22 means that it's something that you didn't want to
23 happen.

24 Q. But she never complained, to the

1 best of your knowledge, she never complained to
2 the company?

3 A. She never complained to the
4 company?

5 Q. She never made a report?

6 A. I don't know if she ever talked to
7 Judy about it or not. You'd have to ask her.

8 Q. And --

9 A. It's more likely she would have
10 talked to her manager about it because they did
11 get along.

12 Q. So when Plaintiff came to you and
13 told you about the instance that she was chased
14 around, you thought that the person wanted to
15 physically interact with her, right?

16 A. Yes. And many of the things that
17 happened to her, I want to say again, she was --
18 she had a good relationship with her manager and
19 she told him about most of these things. Maybe
20 you should depose him.

21 Q. Okay. But again, just to close
22 this off, she, Plaintiff, never told you that she
23 was aware that this person wanted to physically
24 interact with her, right?

JACQUELINE ACEY

Page 93

1 A. I assume that's what chased around
2 means.

3 Q. I understand that, but Plaintiff
4 never told you that, right? You assumed that but
5 she never told you --

6 A. She might have told her manager
7 that.

8 Q. But she didn't --

9 A. You should depose the manager. She
10 told him a lot of things that she wouldn't tell
11 me.

12 Q. How are you aware of discussions
13 she had with the manager?

14 A. She liked him and he seemed to be
15 on her side and she told him about many things.

16 Q. Okay. How do you know --

17 A. She said -- she told me that.

18 Q. Okay. So it's fair to say she told
19 him things she didn't tell you?

20 A. She was his -- he was her manager,
21 so he would be the proper person to tell, I would
22 think.

PTE 9 (10/15/2021 Teams Messages between myself and my Supervisor, Doc 40 Transcript (I)(6), *originals filed in Doc 40-2 pp. 101-124*).

6. 10/15/2021 Excited utterance and present sense impression from myself to my supervisor about Bogdan Proca's a retaliatory/unwanted behavior (Ex. 51-62) References: Doc 15 (¶79), 8-1 (¶28)).

8:38:48 AM Assata: Bogdan over here playing with my unfinished cabinet with a multimeter

8:39:08 AM Assata: Connecting stuff that isn't properly hooked up yet., already heard a popping sound

8:39:36 AM Assata: Also just moved my stuff to other side of cabinet to keep.wprkong and he decided to also move to that side someone come get this man

8:40:06 AM Assata: If anything is broken later I'd blame him., but I guess it's better than him playing with the finished cabinets

8:41:11 AM Assata: He just walked away.... after 5-7 minutes., mess

8:41:58 AM Joren: The 150 in the back?

8:42:05 AM Assata: Yes

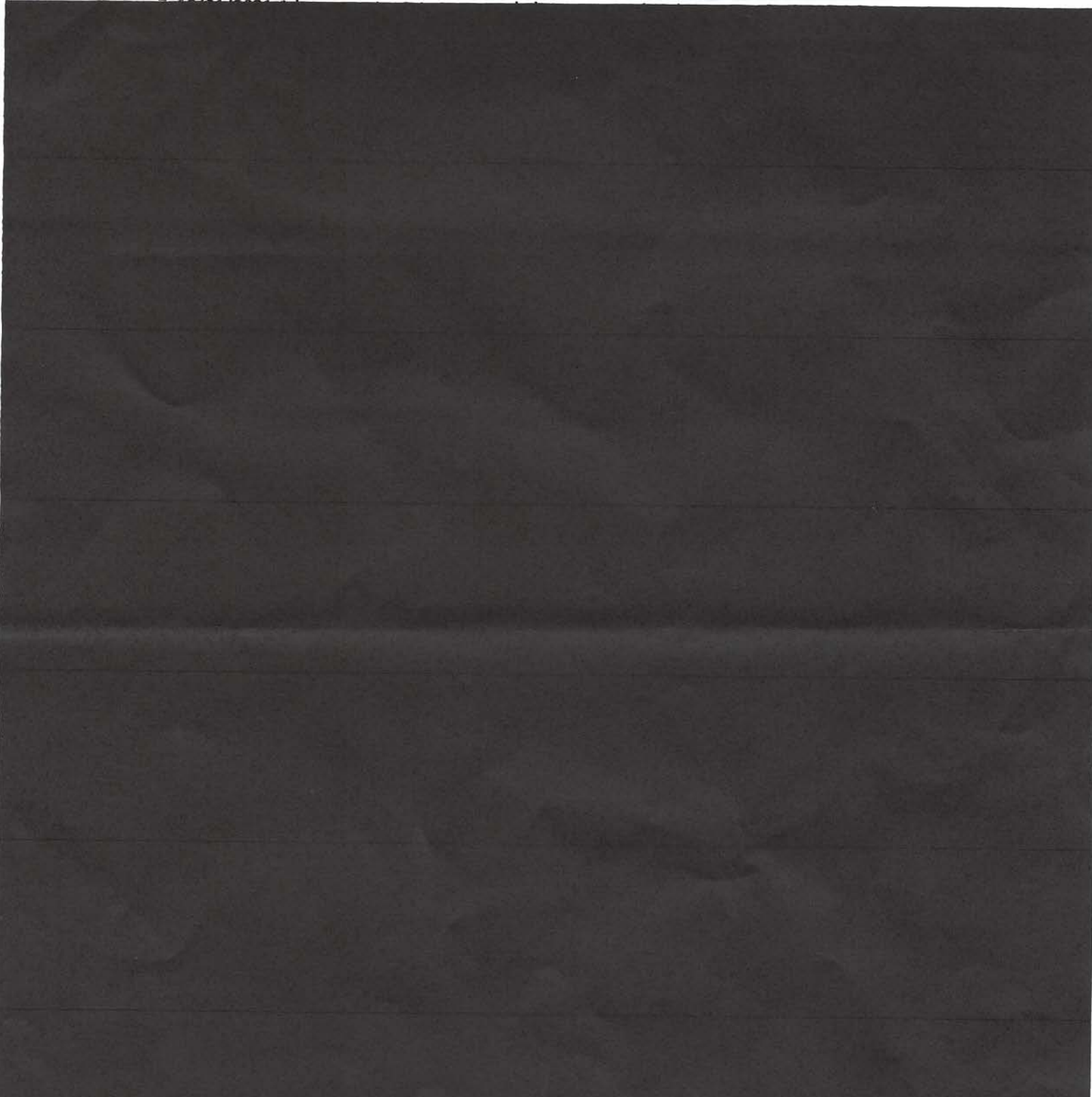
8:42:31 AM Joren: Ugh. Thanks for letting me know.

8:43:06 AM Assata: He literally saw me move all my stuff and Shen went o the other side right where the seat was so I refused to sit until he left.. I have threads to check

8:44:15 AM Assata: On an emotional level I'm annoyed at his rudeness. On a professional level im.hoping he didn't damage anything

8:44:42 AM Joren: Double agree. I'm planning to talk with him once I'm out of this terrible meetin

8:49:18 AM Joren: I need a beer. Please let me know if he ever does that again, he's been told.



PTE 10 (04/11/2024 A. Acey Dep. pp.275-277).

1 I think at the time we agreed that
2 if he kept being weird, it -- we would take
3 not of this behavior as a part of a pattern.

4 Q. And did Bogdan continue being
5 weird?

6 A. Yes.

7 Q. And did you go to Jogan [sic]?

8 A. Joren?

9 Q. "Joren," excuse me.

10 A. Yes. I -- I messaged him when
11 Bogdan was, like -- there's -- there are
12 different instances, but the one that I can
13 remember is specifically the one in the
14 evidence where Bogdan basically -- he went to
15 the cabinets, and acted like he was
16 inspecting them, didn't speak to me.

17 And in order to do stuff at the
18 bottom, I have to sit on this, like,
19 low-riding scooter, which means I'm in a
20 squat. I wear skirts, but I don't really
21 like being very low to the ground in front of
22 people who are standing up, particularly
23 people who I think are creepy, so what I
24 would do is in feeling self-conscious, I

1 would move, you know, the cabinet's, like,
2 kind of shaped rectangularly, I would move to
3 the other side, and he would move to the
4 other side.

5 And, I mean, initially when he came
6 up, "Okay. Whatever." Like, he just stayed
7 there, and he wouldn't move. And at another
8 point, I noticed him coming to the cabinet I
9 was working on, and he had, like, a
10 multimeter in his hand, and he poked one of
11 the tongs at one of the boxes and a spark
12 flew off, which made me worried about my job
13 because, again, I was responsible for the
14 repairs and the status of these cabinets.

15 So if he damaged anything and QA
16 found it or it went to a -- a supply -- a
17 client and malfunctioned, I felt that it
18 would reflect poorly on me.

19 Q. Did -- did anything ever come of
20 that incident with the spark? I mean, was it
21 rejected, did it become a problem? I mean...

22 A. I don't know what happened in the
23 further testing of that unit, but I know that
24 I messaged my boss about it right away, and

1 he said he would have a talk with the
2 Engineering folk.

3 Q. What -- what was Bogdan's role?

4 A. He -- I think he was a principal
5 engineer, Electrical Engineer II, I think he
6 was.

7 Q. Where did he fit with regard to
8 supervision of you? Did he -- was he in --
9 was he Joren's boss, or was he in charge of
10 some other department or section?

11 A. No. I mean the structure was --
12 was pretty horizontal at the company.
13 Principal engineer -- he didn't -- he wasn't
14 even in charge of the normal engineers.

15 If a junior electrical engineer
16 came, he could mentor them, but the manager
17 of the Electrical Engineers was Jerry Frank,
18 Vice President Ben Cohen.

19 My manager was Joren Wendschuh, and
20 I did not report to Bogdan. I actually only
21 had to work with Bogdan one time, and even
22 then I was just supporting him with another
23 teammate.

PTE 11 (12/10/2021 Text messages between myself and my husband pp.711(11:20:07 am-11:20:43 am), 715(13:22:12)-716(13:25:31)).

12/10/2021 11:20:07

Assata (+17702311017)

Sam asked me to lunch again(well everyone generally, but looking at ne and was like please invite others I don't have time)

12/10/2021 11:20:15

Assata (+17702311017)

Mee looking at my timesheet priority list

12/10/2021 11:20:26

Assata (+17702311017)

I told him to ask Tina and that I have cabinets

12/10/2021 11:20:41

Assata (+17702311017)

Which is true but it's not like I wouldn't move it if I wanted to....

12/10/2021 11:20:43

Assata (+17702311017)

Mess

12/10/2021 13:22:12

Assata (+17702311017)

Im also glad you came with me to lunch

12/10/2021 13:22:33

You didn't make me feel weird at all!

12/10/2021 13:22:39

Assata (+17702311017)

Bc all that about Sam sitting in the middle and riding I Bogdans car

12/10/2021 13:22:56

Assata (+17702311017)

And Sam asking intrusive Qs and Jorge joining in was stressfil

12/10/2021 13:23:02

Being around people can make me feel weird. You absolutely do not make me feel weird

12/10/2021 13:23:09

Assata (+17702311017)

Or Bogdan discussing local wives like it's a car and you can have multiple

12/10/2021 13:23:27

I like being around you too. I hope it offered some comfort

12/10/2021 13:23:52

Assata (+17702311017)

Or the waitress smiling at everyone else and maybe not responding to my thank you bc she ain't hear or maybe not

12/10/2021 13:24:18

Assata (+17702311017)

It was very comforting. I noticed these things but I dint dwell on them as an emergency bc I knew you were there too

12/10/2021 13:24:28

Assata (+17702311017)

Sam was prov sad that you rode in the middle

12/10/2021 13:24:30

Assata (+17702311017)

I wasn't

12/10/2021 13:24:59

Lol yeah. Me neither

12/10/2021 13:25:31

It was kinda fun. Sam is something else. "Did you emigrate?" Lmaooo

12/10/2021 13:30:56

Let me know any time you want me to bail you out of something or go along someplace. I love being around you

12/10/2021 13:33:09



PTE 12 (03/01/2022 Text messages between myself and my Husband pp.1847(12:18:46)-1848(12:23:03)).

3/1/2022 12:18:46

Assata (+17702311017)

Sam trying to get me to lunch again

3/1/2022 12:19:00

Assata (+17702311017)

Nearly lied saying Tina is coming too then admitted he didn't ask her

3/1/2022 12:19:04

Lemme know if you need a bailout

3/1/2022 12:19:13

Assata (+17702311017)

Idk why he has to go with me and not just other folks at work

3/1/2022 12:19:34

Assata (+17702311017)

I don't mind inviting others to go with him. Since most folks here are men anyway and unlikely to be weirded out

3/1/2022 12:19:46

Assata (+17702311017)

I'm surprised he still asked after joren talked to his pll

3/1/2022 12:20:52

Assata (+17702311017)

Meh. I kinda feel mean for nit wanting to go. But um going to ignore for a while

3/1/2022 12:21:10

Assata (+17702311017)

He invited bearded guy

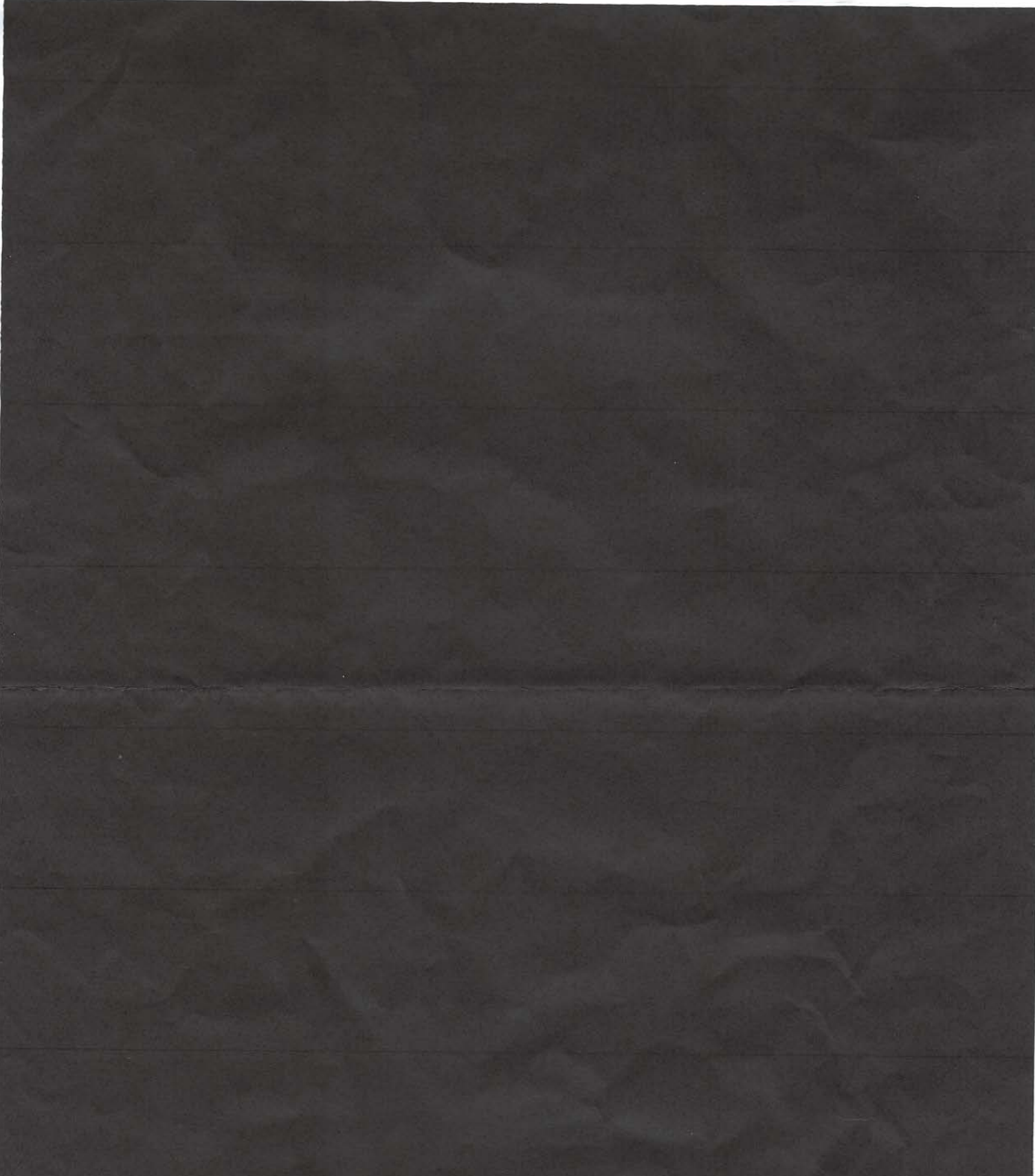
3/1/2022 12:21:19

Assata (+17702311017)

Not mustache man. But beard mam

3/1/2022 12:23:03

Don't feel bad



PTE 13 (08/17/2021 Teams Messages between myself and my Supervisor, Doc 40 Transcript (III)(2), *originals filed in Doc 40-2 pp. 735-740*).

2. **08/17/2021 Excited utterance and present sense impression from myself to my supervisor about the inappropriate and condescending behavior of a white male Quality engineer, Robert Sweirzawski (aka Rob S or "Bob") during his inspection of my competed electrical cabinets (Ex. 364-366). References: ECF 8-1 (¶14-18, 120-121(b-d), ¶124-129, ¶175-177), Doc 15 (¶77-80).**

9:53:54 AM Assata: typing an update on the Quentin cabinet

10:37:16 AM Assata:

Climate notes: What was left out of teamwork update

Summary: It appeared as if Bob and Brenda (mostly Bob) was particularly nasty today- more focused on the drama and personal jabs of finding something new, rather than communicating with me effectively so that I can improve the cabinet—and having respectful/beneficial dialogue about completion stages and guidelines that I have.

Current Response: Bob and Brenda are encouraged to voice concerns also to you and Maria, I will be intentional in my communications with them, will keep an eye out for weird comments and threshold if it becomes a larger issue

Detailed examples:

1.

Bob called me from across the room that cabinet was not inspection ready and brought me over to ask what I saw wrong. He then(while laughing at me and encouraging Brenda to do the same) pointed out a scraper that I had laid there in case they wanted additional work done, he was mid lecture" when you say its ready for inspections...x.y..z.."

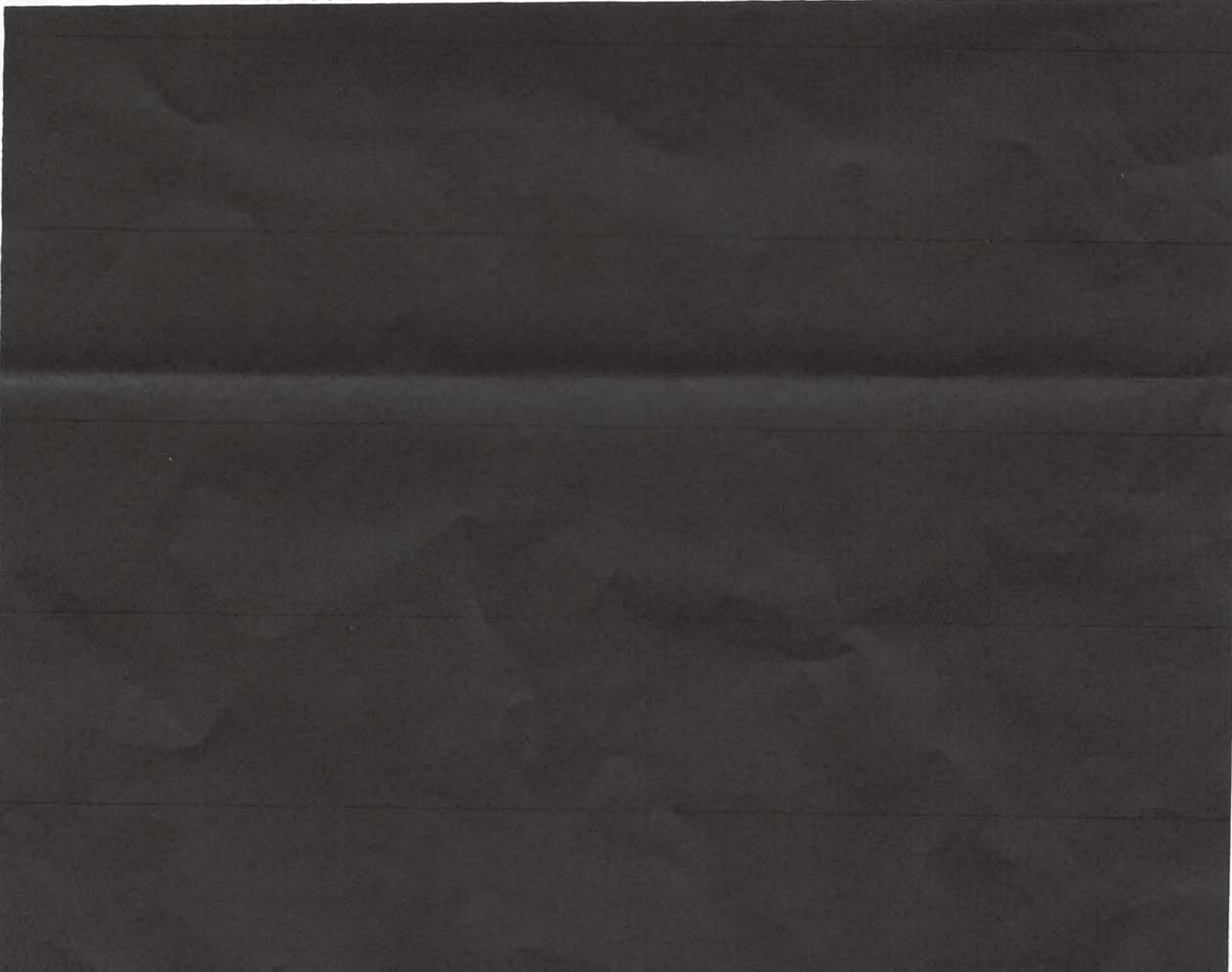
Before I clarified it is not post shipping prep. I dont believe he listened, be instead went into a debriefing on how we are all new, and we "all make mistakes"

2.

After giving my torque paint notes from Maria, Bob saw it as important to explain to me why torque paint is used and that it applies only to points that have been torqued, and that I need to follow my procedure, which I had quoted back to him.

3. Bob originally told me that the serial numbers were all wrong today. After reiterating to me unsolicited about what each item I had worked on was, he finally confirmed to me that the traveler just needed to be updated. Answered my question asking this with "Thats the best and neatest way"

12:53:06 PM Joren: Hmm. Thanks for the update on climate, ugh. Thanks. Next QA check, please include me on.



PTE 14 (11/16/2021 Teams Messages between myself and my Supervisor, Doc 40 Transcript (III)(11)(3:05PM-3:28:21PM), *originals filed in Doc 40-2 pp. 838-867*).

3:05:50 PM Assata: Hey, I'm thinking that the flow assembly that Rob flagged, the one. We did is the right one and that the 9thers ones angle is too harsh

3:06:00 PM Assata: At first I thought this put of sheer bias and labor

3:10:39 PM Joren: Please help me understand this, I'm sorry.

3:14:07 PM Assata: But after looking at both and considering the req of 1.75" on an angle, the top one looks right which means the angle on the other is off, and the angles on alot ofthe others are likely too large as well

3:14:17 PM Assata: Omw

3:15:12 PM Joren: Oh... Rob == Bob.

3:15:51 PM Joren: You're saying you think the other 150 flow assemblies are needing to be updated with reworked ones for the angle?

3:16:03 PM Assata: Correct

3:16:37 PM Joren: Ok. Please request from inventory, and send these back for repair after you get the first.

3:24:59 PM Joren: Thank you!

3:25:39 PM Assata: Ngl I did not type this messages. Teamwork prepopulating and accidental hand dial

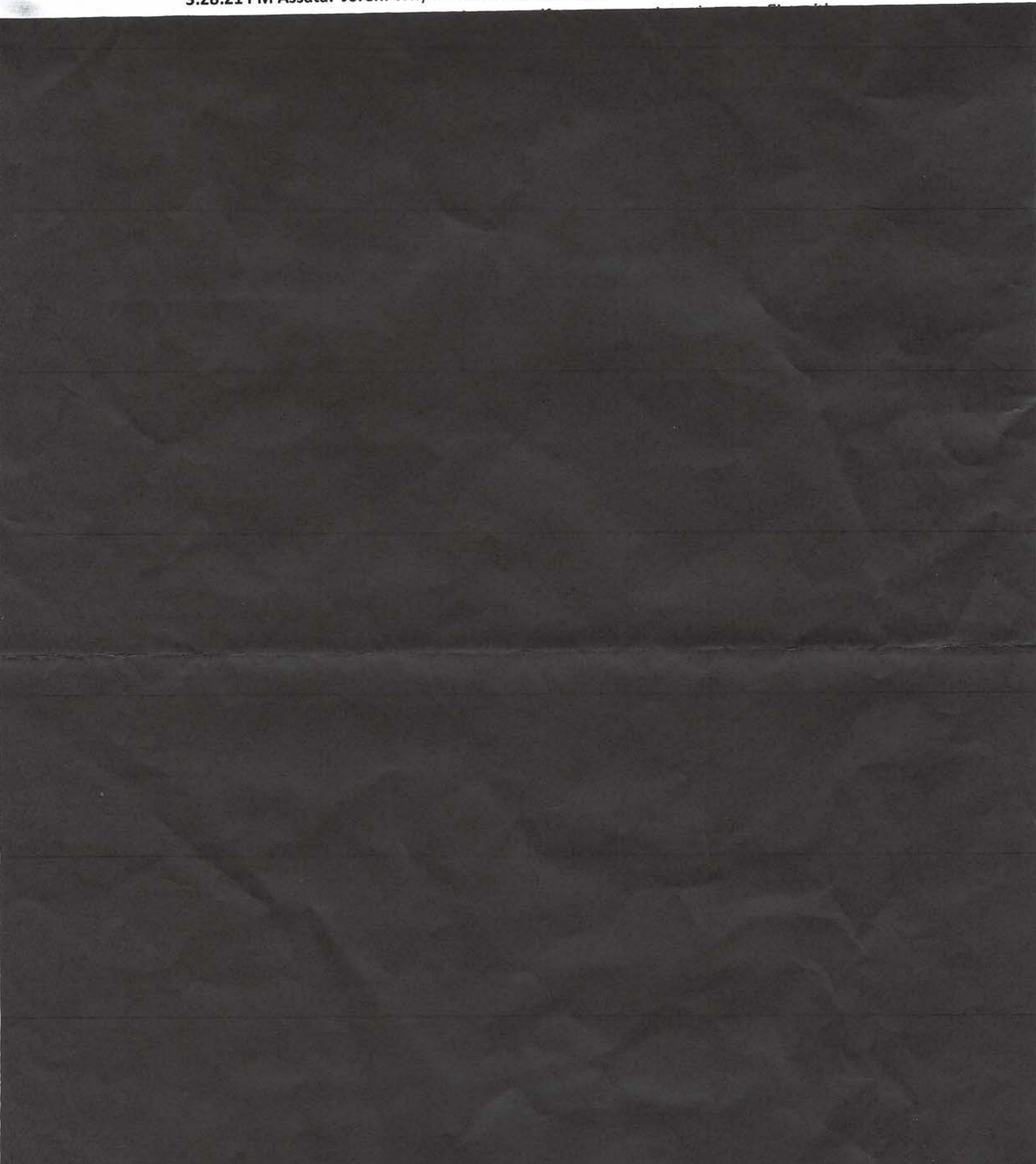
3:26:01 PM Assata: [Direct response to message from 3:26:01PM] did not type this at al

3:27:28 PM Assata: But the answer is yes. Monday has assemblies: a and b 1 .Bob flagged assembly a which we made. But b looks wrong 2. Most of our assemblies look like b

3:28:15 PM Assata: To be clear you're saying request a replacement for b and then send b back

for test?

3:28:21 PM Assata: 'Joren: Why Rob and not Bob?' Typo



**PTE 15 (10/22/2021 and 10/28/2021 Emails
and Teams Messages between myself, QA
Team, and my Supervisor, Doc 40
Transcripts (III)(7-9), *originals filed in Doc
40-2 pp. 763-771, 1723-1734*).**

7. 10/22/2021 Adverse party statement from Quality Manager Joe Sokalski acknowledging my authoring of a report for quality escalation, as well as my submission of same report to the QA team and my supervisor. References: ECF 8-1(¶3, ¶6, ¶32-37, ¶134-163), Doc 15 (¶82-83), ECF 15-61, ECF 15-62, Doc 20 (¶8-49), ECF 20-5 to 20-16, ECF 20-21. Prior escalations: Ex. 850-855.

5:35 PM Assata:

Hey Joe, For your notice, two of the flow assemblies procured from PAI arrived with, missing parts, an extra part, and incorrect installs according to their assembly Doc(A-01720). I have attached labelled images for each item, as well as the windchill assembly Doc. Here they are

below:

Missing Parts

1. Both flow assemblies are missing 1 quick connect each, as denoted by page 5(step3)
2. Both Flow assemblies are missing 2 caps each as denoted by page 7(step 1).

Extra Parts

1. Of these two, the first flow assembly has an extra G fitting(0100005618) as denoted by page 4(steps 2 and 6).

Incorrect Install

1. With cap +quick disconnect added, the first and second flow assemblies are angled to cap heights of 3 % " and 4 % " respectively. The spec denoted on page 6(step 5) is 1 %" .
- 2.. The second flow assembly also arrived with a loose joint.

[Attachments -01720.pdf; Missing Parts 1 and 2-Caps and Quick Disconnects.png; Extra Parts 1-First Assembly Double Fittings.png; Incorrect Install 1-Second Assembly Cap Height.png; Incorrect Install 2-First Assembly Loose threads.png; Incorrect Install 1-First Assembly Cap Height.png]

6:44 PM Joe S: Thank you Assata. I will be sure to share this with PAI and correct for future builds.

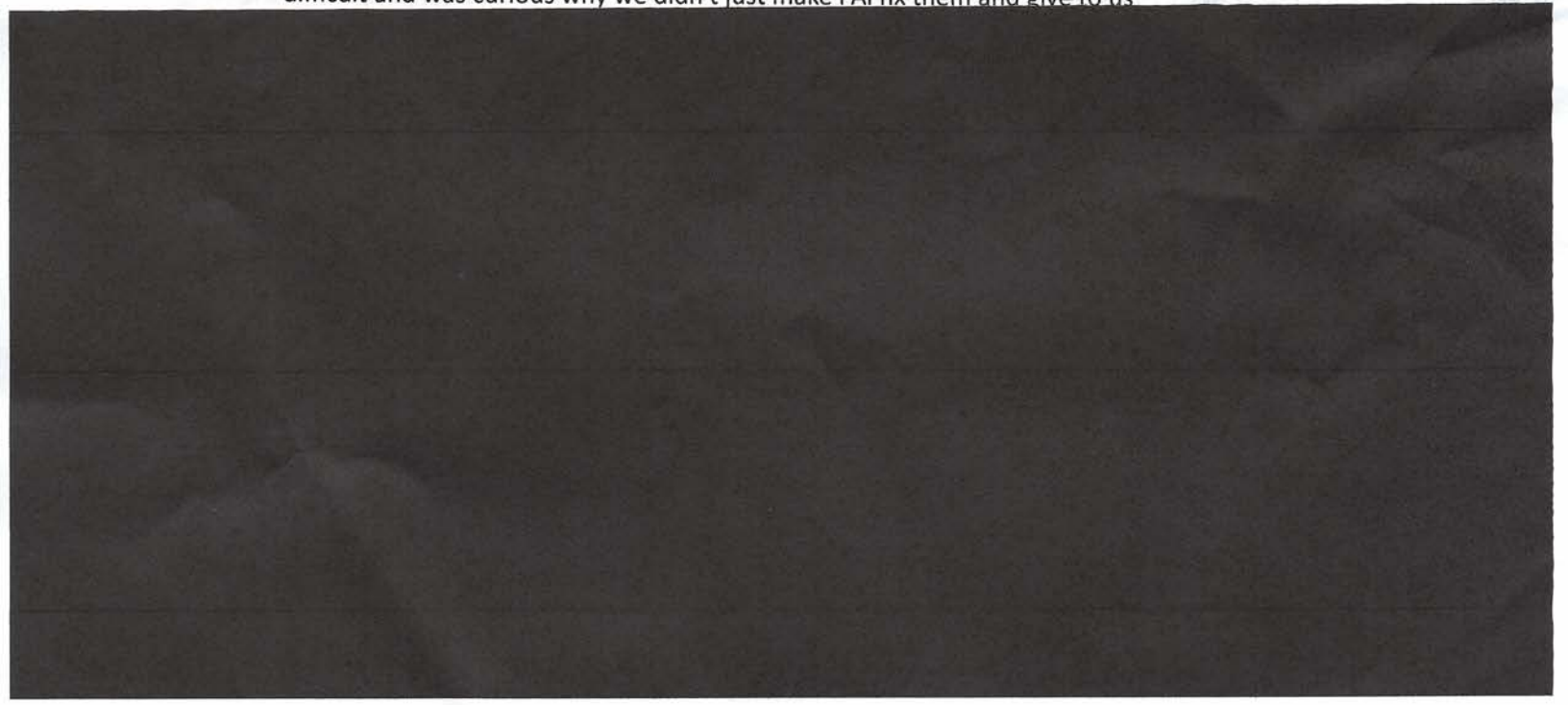
8. **10/25/2021 Present sense impression from myself to my supervisor of the former QA manager (Joseph Sokalski) assigning flow assembly compliance to Rob S. (Ex 378-379). References: ECF 8-1 (¶14-18, ¶120-121(b-d), ¶124-129, ¶175-177), Doc 15 (¶77-80).**

2:35:48 PM Assata: Joe's verbal response to flow assemblies is that he never read the email but sent it to Bob and sent Bob to PAI do check all the assemblies they have in inventory

4:46:44 PM Assata: Also I came to findyou to say that those flow assemblies are a nightmare and Im gonna try again tomorrow

9. **10/28/2021 Present sense impression from myself to my supervisor about the difficulty and time we spent together correcting the misassembled assemblies for completion of an in-demand enclosure (Ex. 380-381). References: ECF 8-1 (¶14-18, ¶120-121(b-d), ¶124-129, ¶175-177), Doc 15 (¶77-80).**

2:11:10 PM Assata: I have so felt led to add the for the flow assembly Maria did agree that it was difficult and was curious why we didn't just make PAI fix them and give to us



PTE 16 (12/14/2021 Teams Messages between myself and my Supervisor, Doc 40 Transcript (III)(14), *originals filed in Doc 40-2 pp. 933-1089*).

14. **12/14/2021 Excited utterance. recorded recollection and present sense impression from myself to my supervisor regarding the antagonistic behavior of Rob S AND sexual harassment/coping concerns about Rob S, Taylor Johnson, and Daniel Winters (then-Supply chain manager) expecting me to do additional cleaning instead of Rob Rosenberger on a cabinet he was responsible for (Ex. 462-538). References: ECF 8-1 (¶14-18, ¶120-121(b-d), ¶124-129, ¶175-177), Doc 15 (¶77-80).**
- 9:21:12 AM Assata:** I feel like he's determined to waste my time
- 9:21:27 AM Assata:** *Attachment sent to Joren : Screenshot shows email from Assata Acey to QA team at 8:58 AM and reply from Robert "Bob" Swierzawski at 9:11 AM:
- Morning All, The cable connectors for the ozteks in the the fortrum-oslo and Soltrans cabinets have all been checked, tightened and painted yesterday afternoon to indicate further loosening.

Please review and inform me of any further barriers to pre-test approval. Bob, Thank you for pointing this out!

Response from Bob: Come over and say Hi when you get a chance.

9:21:46 AM Joren: ... *box with shrunken text*

9:21:52 AM Joren: Please don't text and drive.

9:22:47 AM Joren: I'll follow up with him this morning, please hold off "coming over and saying hi..."

10:21:06 AM Assata: Do you have Busy work for basement?

10:23:17 AM Joren: Please pull the keys for the tool box

10:23:25 AM Joren: Open the Green cart over here on it's own.

10:23:30 AM Joren: Put away multimeter, probes, etc.

10:24:11 AM Assata: Kk. Also Bob emailed to say it's all a pass so need to avoid hovering while he avoids signing travelers so I can copy/notify rob

10:25:03 AM Joren: Please details? lost.

10:25:17 AM Assata: Bob likes to take time to sign travelers

10:25:37 AM Assata: Before my Thanksgiving trip he took a smoke break and various other things to avoid signing to where I spent an extra hour

10:25:40 AM Assata: Waiting on him

10:25:51 AM Assata: After the inspection

10:26:33 AM Assata: So it's easier for me to avoid pestering him be i know that will want to. Esp with Rob posting his test schedule emails in such a loud but harsh way

10:27:00 AM Joren: Gotcha, thank you.

10:27:21 AM Assata: Instead of coming across as effective communication, it feels like he wants to avoid talking to me when at all possible and only communicate when he needs something. And putting it over the travelers was much

10:27:30 AM Joren: Ughs. Yes.

10:27:48 AM Assata: And telling me all that just for the time almost implies other things

10:28:01 AM Assata: But yeah of course I'd want to tell him it's signed and he can leave me be

10:28:08 AM Joren: Would you please get the DT white sealing plug part number for Tina and message it to both of us? It should be in the wire cage - in a white plastic box, on the far left cage, top shelf

10:37:13 AM Assata: *unknown Attachment*

10:37:22 AM Assata: This is the container for dt plugs

10:37:29 AM Assata: There are a LOT of DT boxes.

10:37:33 AM Assata: Looking for sealing plugs

10:37:44 AM Joren: Possibly in the DT pins box - in the back row of boxes on the right, top

10:37:49 AM Assata: But this was the box labeled for connector plugs

10:38:12 AM Joren: fair... plugs != sealing plugs

10:40:54 AM Assata: Ok so the pins box doesn't have

10:40:56 AM Assata: It

10:41:11 AM Assata: Praise God the travelers are signed

10:41:21 AM Assata: I'm going to make copies

11:01:18 AM Assata: Copies made doors locked

11:01:23 AM Assata: Keys removed

11:01:37 AM Joren: Yay!!!

11:01:46 AM Assata: Thank you. Please ask Brian for help finding the DT plugs then.

11:04:36 AM Assata: Ok I've gone through nearly every box on the top left shelf of the cage and have found d no lugs

11:04:39 AM Assata: Plugs

11:04:59 AM Assata: Unless, these are items we require per assembly through inventory

11:06:13 AM Assata: The only th ing similar would be the super seal

11:06:21 AM Assata: Te super seal container

11:06:26 AM Assata: And it's very different

11:06:39 AM Assata: *unknown attachment*

11:09:15 AM Assata: Omar said brian had rhen last

11:11:57 AM Assata: Found it

11:27:08 AM Joren: Great!

12:31:47 PM Assata: Bob asked to see my BOM for the 75kw US

12:33:05 PM Assata: ANs now is walking around with my assembly doc

12:33:10 PM Assata: Eating lunch with it..

12:34:08 PM Joren: why are you so keen to give it up? ugh. dam it Bob

12:35:16 PM Assata: ... he asked nicely being nice to ppl should backfire

12:35:27 PM Assata: Hw told inventory they need to wipe down theb75 before shipping

12:35:41 PM Assata: Taylor and Daniel W gave me puppy dog eyes

12:36:08 PM Assata: At what point does Rob have ti to cabinets when he finishes testing? Do we all have to hand off clean cabinets?

12:36:10 PM Joren: Tell them to request it via the form...

12:36:17 PM Assata: Or is that inventories Job

12:36:35 PM Joren: Not our problem.

12:36:45 PM Joren: Test hands it off to shipping.

12:37:02 PM Assata: Even if it gets dirty during test?

12:37:21 PM Joren: Test's problem with Supply Chain.

12:39:36 PM Assata: alrighy I can wipe this one and tell them to work it out with Rob and them in the future

12:39:53 PM Assata: Bc I am a girl and it looks bad

12:39:56 PM Joren: Or just ask them to tell me.

12:40:00 PM Joren: WHAT?

12:42:16 PM Assata: Lol if it's not for my station than to defer to me for cleaning looks bad

12:42:39 PM Assata: #domesticity

12:43:13 PM Assata: Meh. I'm in an ok mood rn

12:43:29 PM Joren: I'm not

12:45:43 PM Assata: Not Bob coming back without my assembly to ssay "yeah assata the only thing this thing needs is vacuuming"

12:45:52 PM Assata: I'm going to start laughing at him

12:46:11 PM Assata: Best way to lighten up

12:51:34 PM Assata: I think he asked Omar what he did with moment his mother gave him □ Omar had to ask him a few times to repeat himself. He says he's fine tho

12:54:50 PM Assata: Bwhaha

PTE 17 (04/07/2022 Teams Messages between myself and my Supervisor, Doc 40 Transcript (III)(18), *originals filed in Doc 40-2 pp. 1110-1121*).

18. 04/07/2022 Present sense impression from myself to my supervisor of seeing Rob S tampering with one of my builds before an inspection (Ex. 549-554). References: ECF 8-1 (¶4-6, ¶14-23, ¶120-121(b-d), ¶124-129, ¶175-177), Doc 15 (¶77-80).

11:04:41 AM Assata: Ci cern-1 saw Bob touching cables this morning while I chatted Maria.

11:04:57 AM Assata: I've gone back and retightened stuff

11:05:01 AM Assata: And locked that side

11:05:29 AM Assata: Also Taylor has cabinet key on his desk. Idk y but I just hope Bob or others aren't using it

11:05:54 AM Joren: Thank you. I'll bring this up with Joe.

11:08:09 AM Assata: It was so quick. I'm going to try to check stuff like you said lat year and try

PTE 18 (12/07/2021 Teams Messages between myself and my Supervisor, Doc 40 Transcript (I)(11), *originals filed in Doc 40-2 pp. 173-192*).

11. 12/7/2021 Excited utterance from myself to my supervisor about unwanted touch from Mike Russell, who had tapped on my shoulder while grazing past me from behind in a standard-size walkway exhibit 87-96. References: ECF 8-1 (¶128, ¶175), ECF 15 (¶179), ECF 15-52, ECF 15-53.

12:53:28 PM Assata: Not Mike Russell tappi NV my shoulde *unknown Emoji*

12:53:30 PM Assata: Mess

12:53:46 PM Assata: Hallway ain't that small

1:15:20 PM Assata If he touches me in rhough I will have to consider gutting with a dull spoon. But also I guess conspicuously and disconcertinglt discuss that I don't like being touched

1:27:57 PM Joren: Please help me understand the sentence above, so I can help.

1:29:10 PM Assata: I was saying if Mike touches me again I will be upset. But I will also express to him around witnesses in a way that can be insidiously uncomfortable for him that i don't like touch.

1:29:18 PM Assata: Be negative reinforcement

1:30:04 PM Assata: And be the third time I'd feel bad for myself to not snap..

1:30:08 PM Joren: Okay. Thank you for spelling it out.

1:30:13 PM Assata: Hoping he just doesn't at all

PTE 19 (04/07/2022 Teams Messages between myself and my Supervisor, Doc 40 Transcript (I)(13), *originals filed in Doc 40-2 pp. 243-254*).

13. 04/7/2022 Present sense impression and excited utterance from myself to my supervisor about sexual behavior of engineer "Gary". Ex.122-127. References: ECF 8-1(¶28, 1¶75) Doc 15 (¶79).

1:26:05 PM Assata: When yalla re done pis don't forget to look at the rail hole

1:54:07 PM Assata: Gary keeps looking at me up and (middle?) Even when i had on a coat? I waved but he didn't say hi.. I think the staring has been mostly today. I hope he's OK

2:22:08 PM Joren: Rail hole?

2:24:12 PM Assata: You already did srly

2:36:22 PM Joren: No need to be sorry.

2:36:24 PM Joren: WTF Gary.

PTE 20 (04/11/2024 A. Acey Dep. pp.

269(116)-272(121)).

16 Q. You also mentioned that you were
17 concerned about some of the questions or a
18 question that was raised during the diversity
19 and harassment training that was provided on
20 July 13th, what -- what are you saying there,
21 what --

22 A. So she had had on the screen types
23 of, like -- I guess she was talking about,
24 like, sexual harassment. I just remember

1 there were, like, circles on there, and I
2 sat -- so the door was --

3 THE VIDEOGRAPHER: Your mic
4 fell off.

5 THE WITNESS: Sorry. Hold on.
6 So, like, the door was, like,
7 over here, and, then, I sat near
8 the -- like, right in front of the
9 door.

10 And the guy, Bogdan, was
11 there. Judy was over there. And
12 he was, I guess, talking about his
13 experience. He came from, like,
14 Princeton or whatever doing -- as a
15 faculty member, I guess.

16 And he -- he was talking
17 about -- he made some weird joke
18 about liability as far as, like,
19 sexual harassment, but he also
20 asked Judy about, like,
21 supervisors, they -- like, their
22 subordinates because Judy was on
23 the topic of how, like, what the
24 company's policy is on dating at

1 the company, like, they don't
2 encourage it, but they weren't,
3 like, super against it, but for
4 ethical reasons they prefer not to
5 have people who work together in
6 the same department.

7 She talked about her brother
8 being the VP of Engineering, and
9 how she -- she made a joke about
10 liking the boss in the room.

11 But, anyway, the thing was
12 Bogdan -- he asked his question,
13 and she was -- she was saying that
14 they didn't have really any
15 examples of that.

16 And, then, he pushed further,
17 and he was, like, you know, "It's
18 natural."

19 The thing is he was -- you
20 know, like, on a diagonal from me,
21 and he had been smiling in my
22 direction for a while, even when I
23 wasn't speaking. And when he
24 mentioned it being natural, he

1 wasn't looking at her. It was,
2 like, 90-degree angle to him. He
3 was looking more at me.

4 And it made me very
5 uncomfortable because it just
6 didn't make sense. I couldn't
7 understand what made him think it
8 was natural, and I couldn't
9 understand why he kept smiling at
10 me when I wasn't speaking.

11 BY MR. SCHAUER:

12 Q. Did you confront him?

13 A. No.

14 Q. Did you raise that fact with Judy
15 after the session was over saying, "Hey, this
16 guy, Bogdan, is kind of looking at me in a
17 way that's kind of creepy"?

18 A. No. I talked to her about him at
19 the 90-day check-in, which was at least three
20 months -- I guess since orientation wasn't
21 the first day, so what's that, like, two
22 months or so after orientation, after I felt
23 like it had built up.

PTE 21 (08/30/2021 Teams Messages between myself and my Supervisor, Doc 40 Transcript (III)(3), *originals filed in Doc 40-2 pp. 741-748*).

3. **08/30/2021 Present sense impression and excited utterance from myself to my supervisor about how Rob S' omitted my and a female engineer's notes his final report on a quality issue that we escalated, diminishing our involvement while referring to us as ladies (Ex. 367-370). References: ECF 8-1 (¶14-18, 120-121(b-d), ¶124-129, ¶175-177), Doc 15 (¶77-80).**

10:51:50 AM Assata: Its been an actual Jumble of interactions and updates today(and its only 10:49!) . But Im typing up a summary of an improvement we found for the ozteks so I will send that first and circle back

11:44:04 AM Assata: Here's the short

Maria looked at the stuff, called Bob over and sadly true to his currently compiling algorithmic behavior, he mans-plained it.

Context: This is algorithmic in context of his more damaging comments and condescending behavior towards me during the QA review of Quentin(ifyou recall, those climate notes).

Situation Specific Points:

1. I had expressed how excited I was to write the notes down so we wouldn't forget, and Maria told me to send them to Bob and he agreed. Instead he sent a one liner to Joe and cc'd us
2. He also left out what had happened and
3. Bob's delivery left holes in how far maria had actually looked into and thought through the issue

Last point and overall effect

4. Bob then called us ladies, which kinda underscored his behavior of not listening, not waiting for input that he agreed to receive, and inputting false information to the effect of misrepresenting an event.

Resolution and reasoning

1. The current resolution is to continue documenting and sending out communications electronically, so that what was said and done can be clearly spelled out.

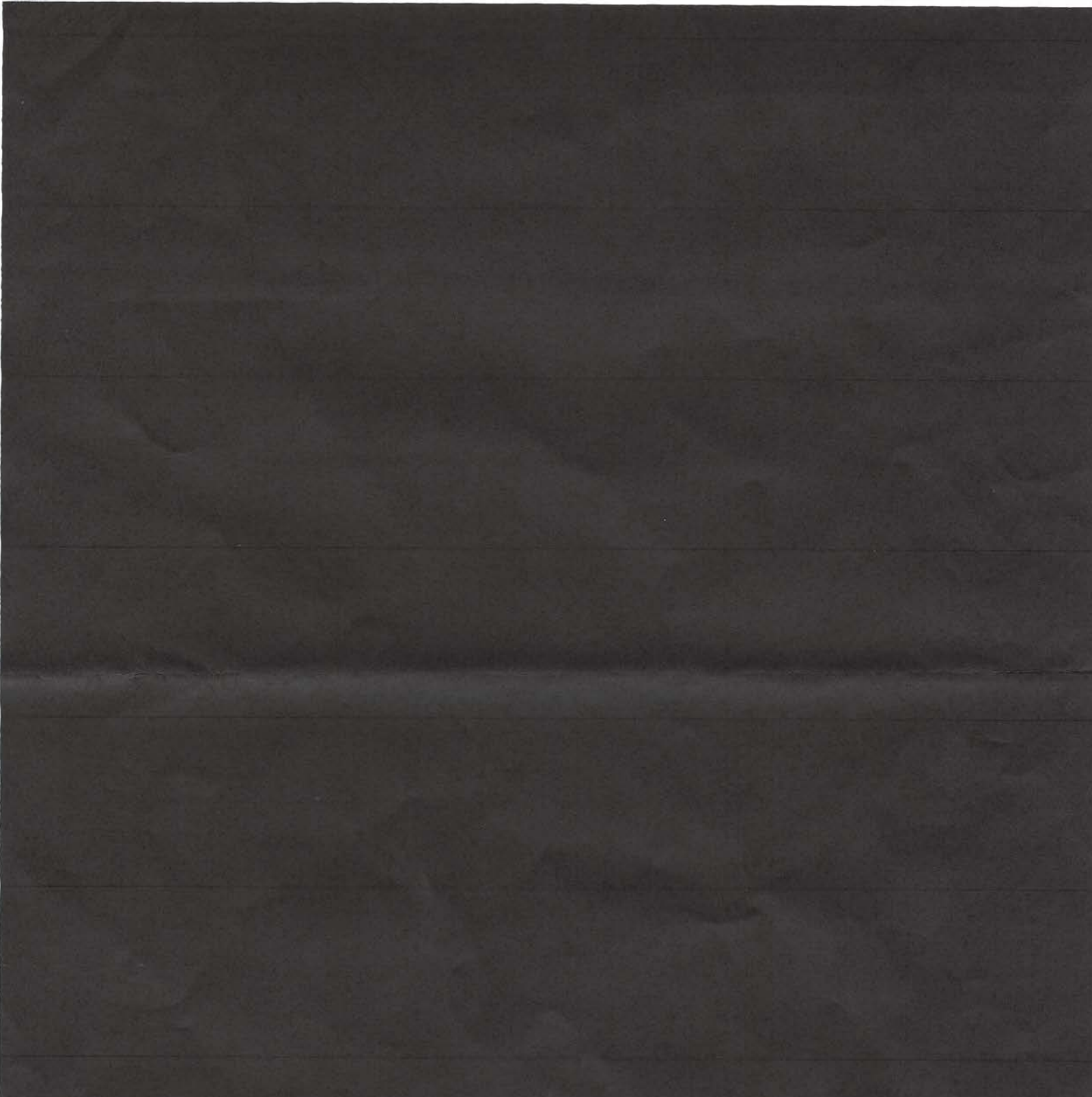
Reasoning ; Comparing notes with Maria, we have each had experiences where Joe did not give benefit of the doubt for actions and thoughts taken towards an issue. Joe is filling in blanks

about what is not said(benefit of doubt not given), whereas Bob is overwriting what is said. While these differences are notable on the scale of obvious to subtle, both would stand to benefit from documentation

Open also to any supports you can imagine there and even in future case by case bases

11:52:29 AM Joren: Understood. Sorry this happened, was hoping to be there for the next QA time.

11:53:40 AM Assata: it wasn't even an inspection



PTE 22 (11/18/2021 Teams Messages between myself and my Supervisor, Doc 40 Transcript (III)(13), *originals filed in Doc 40-2 pp. 900-932, 1737-1738*).

13. **11/18/2021 Present sense impression and excited utterance from myself to my supervisor of Rob S' passing of assemblies that are outside of Maria Tabbutt (the lead mechanical engineer for this unit)'s specifications and willful obstruction of the passing of my cabinet builds (Ex. 446-461). References: Ex. 857, ECF 8-1 (¶14-18, ¶120-121(b-d), ¶124-129, ¶175-177), Doc 15 (¶77-80).**

11:40:11 AM Assata: mark just brought flow assemblies(angle is still wrong) but apparently QA passed them which is whatever

11:40:27 AM Joren: Within Maria's tolerance?

11:40:35 AM Assata: gonna remove the other two and give to him

11:41:05 AM Assata: theyre within her new tolerance, theyre at leas .5" or more beyond the oriinal spec

11:41:23 AM Assata: idk how QA or even Mark isn't just looking at these and measuing

11:41:33 AM Joren: I'll talk with QA.

11:41:41 AM Joren: Appreciate it. Do you know who passed them from QA?

11:42:45 AM Assata: *unproduced attachment*

11:43:05 AM Assata: But idk. Prob Bob be I showed Brenda how yesterday but I'll ask

11:57:10 AM Assata: it was bob [Bob S]

11:58:28 AM Assata:

1.1 confirmed he had passed them.(i asked/showed brenda first and she ws fed uP)

1.5 I mentioned the latest email that went out on tolerance(he claims he never saw-this is

important)

2. I showed bob the item put it in position of the photo I sent you and cited the spec
3. he didnt believ me or eyes [bo]th and pulled a ruler off his desk
4. he feigned surprise that it was nearly 2.5" despite him placing ruler in wrong place
5. He then looked at me with a straight face nd said "it doesn't matter"
6. i reiterated the orignal email contents and what he did by failing the wrong assembly and he smiled at me saying "we didnt know" and asked me to to send him the other email

12:05:57 PM Assata: contradictions:

A("it doesn't matter")

1He was going to say the angle being off doesnt matter after citing an angle being wron[g] on one of the units.

2He went to PAI after angle and torque issues and said he had f[ai]led them due to this b[u]t will now say it doesnt matter

3He was privy to the initial email with all issues includng angle associated with the items and said it doe[sn't] matter

4he decided to either, not read the assembly doc these are assesed, to, or read it and ignored that part.

B("we didn't know")

1. he had access to the assembly doc, should have read it and "he didn't know"

2. he had access to original email detailing this a s a c[au]se for concern and and "he didnt know"

Conclusion

This man has shown, by sheer ignorance or lack of weight on words of mine or Maria(misogyny) or some other issue, that he made his own decision about a spec and was "passing things" as he saw fit without communication, documents be damned.

Impact

This lessens the design, reliabilty and quality of products from the level that Momentum's tech/engineering/design teams can reach, down to the capabilities of one man, who doesnt communicate.

12:07:06 PM Joren: Thank you for the detailed explanation!

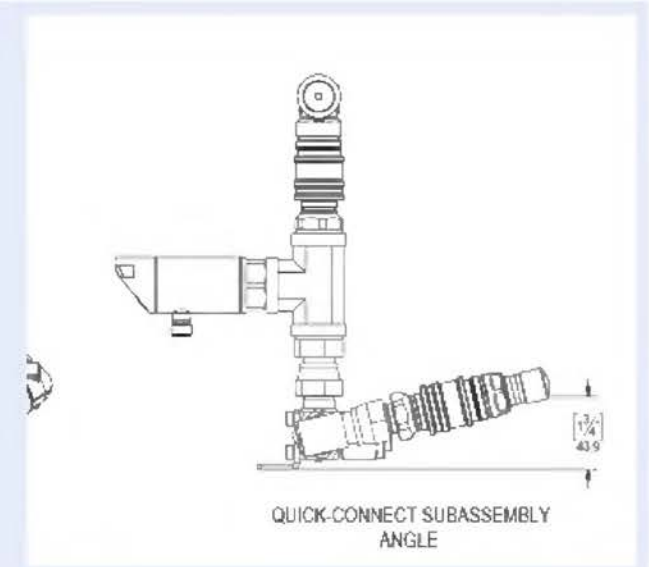
12:07:22 PM Joren: Sad that he's doing this. I'll address it too.

12:07:32 PM Assata: he was willing to have folks go in circles on his own incompetence. I like dan and seengn him around makes me more internally calm but ye that whole scenario is trash

12:07:51 PM Joren: Agreed.



**PTE 23 (10/22/2021-11/18/2021 Teams Messages
between myself and Maria Tabbut, Doc 40
Transcript (III)(6), originals filed in Doc 40-2 pp.
757-762).**



Was there an update to documentation, or how is this angle toleranced now?

Maria Tabbut 2:35 PM
no updates to documentation yet

Last read

Maria Tabbut 2:35 PM
I told Bob to keep within $\pm 1/8$ " to $1/4$ " -0"

6. 10/22/2021 Present sense impression from myself to Maria Tabbut (female senior mechanical engineer) regarding Rob S's preparedness (relative to Brenda Randolph, QA technician and the only other black woman employee) for his Quality inspection of my completed cabinets (Ex. 375-377).
References: ECF 8-1 (¶14-18, ¶120-121(b-d), ¶124-129, ¶175-177), Doc 15 (¶77-80).

2:51:55 PM Assata: Hope in the checks have been restored. Rob came with a bowl of popcorn.
But Brenda came with notes and assembly sheet so they're going through the steps praise God

2:54:17 PM Maria: ahahaha

PTE 24 (10/08/2021 Teams Messages between myself and my Supervisor, Doc 40 Transcript (I)(5), *originals filed in Doc 40-2 pp. 37-100*).

5. 10/08/2021 Excited utterance and present sense impression from myself to my supervisor about sexual harassment from Ron Turi's former assistant (Volans)

(Ex. 19-50). References: Ex.842, ECF 15-51, Doc. 15 (¶¶79) ECF 8-1(¶¶28, ¶¶175)

3:39:14 PM Assata: Cat person keeps buying stuff and not asking me first

3:39:29 PM Assata: I just explained how weird it was and demanded their venmo

3:40:05 PM Assata: Also twice have been asked if I'm sick and why I'm covered with jacket etc

3:40:37 PM Assata: This is strange but also uncomfortable be halftime if I'm not cold the jacket is to cover my shoulders et c

3:40:41 PM Assata: A mess

3:50:32 PM Joren: Oh no.

3:50:35 PM Joren: Who's cat?

3:50:43 PM Assata: Car

3:50:46 PM Assata: Sorry

3:50:57 PM Joren: Ron's friend?

3:51:06 PM Assata: Yeth

3:51:24 PM Joren: WTF?

3:51:32 PM Assata: Same?

3:52:01 PM Joren: Random dude is buying you stuff and gifting you it? You don't want a "owe" feeling, so you want to pay them back?

3:52:02 PM Assata: To their credit they only asked about jacket once

3:52:30 PM Joren: Any examples?

3:52:34 PM Assata: Julian mentioned earlier so I was saying twice but it's also October

3:53:15 PM Joren: it is "normal" here, to be asked if you're cold, sorry Usually it's meant with

care.

3:53:20 PM Assata: He ordered those insert clips that go in the car, printed out a how to sheets and when I didn't give number he wrote out he link and left it in the cabinet

3:53:23 PM Joren: Examples of buying you stuff

3:53:43 PM Joren: hmm. wtf.

3:53:51 PM Joren: I'll have a conversation with Ron. Thanks.

3:53:56 PM Assata: Then gave me clips and info to return what i didn't use

3:54:34 PM Assata: Then today after asking if I was gonna buy the plastic covers and me saying no be it's not that damaged he went and told me he'd ordered those and what that cost and shipping was

3:55:15 PM Assata: And refused to let me Venmo him u til "we" installed In case it didn't fit be they would take "full responsibility" if it didn't work

3:56:37 PM Assata: And like Joren, being nice is one thing, doing research, meh, ordering and giving me parts to use Pushing it, asking for my number to share a how to video.....leaving me a written note in cabinet for the link.....ordering more stuff after I said I didn't need to go through trouble and not letting me Pa[y] for it...

3:57:11 PM Assata: And THEN Comme ting on something covering me and Nanking ofthags why I'm covered when I'm already uncomfortable

3:59:13 PM Assata: I really don't want to hurt their feelings but they're also a grown adult

3:59:32 PM Joren: Yes. I'm reaching out to Ron about this currently.

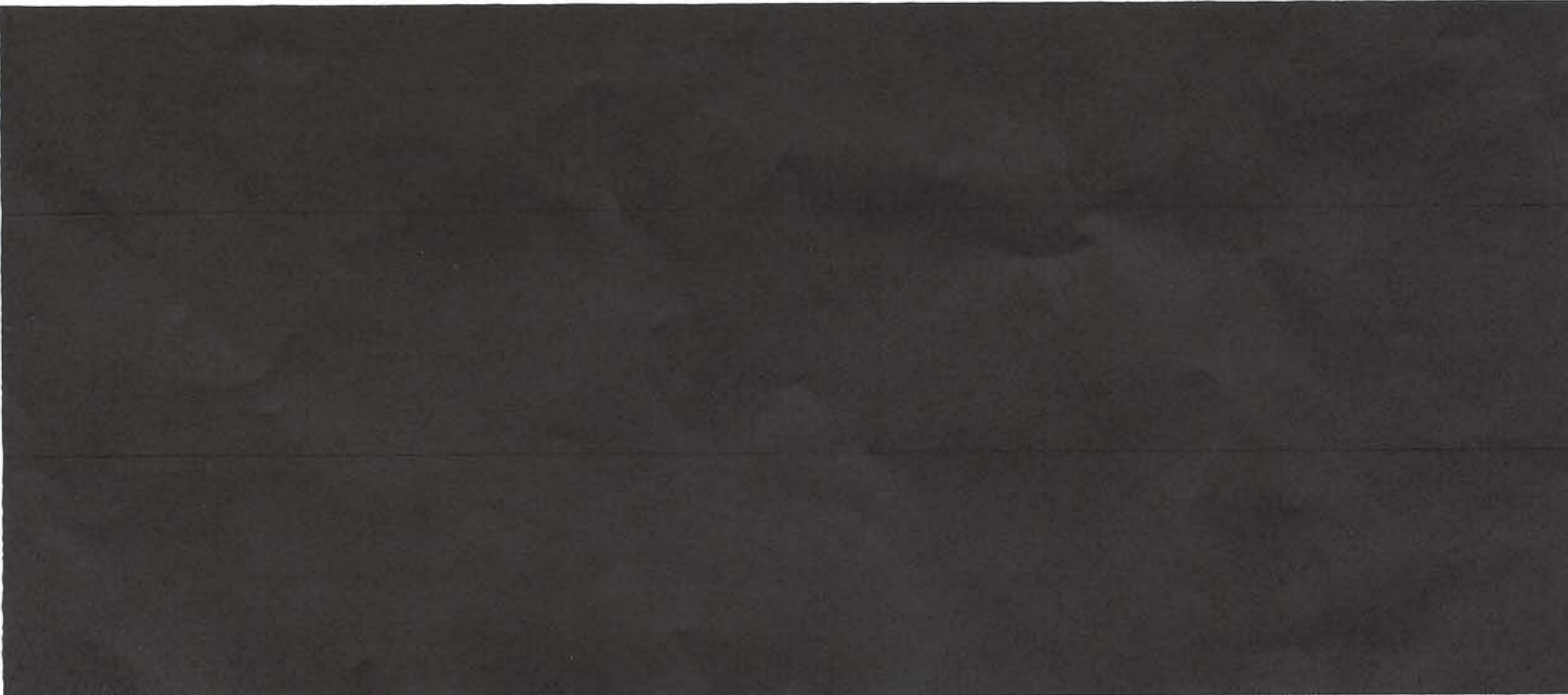
4:58:49 PM Joren: Assata, No need to read this until you're back at work (certainly no need to spend the weekend (mentally) on it). Hey, had a talk with Ron. He suggested two paths, please let me know which one you are OK with.

1 - chatting with Ron, himself, to have Ron better understand the details, so they can be addressed directly (I don't have any issue with sitting in if it makes you feel more comfortable)

2 - him addressing it with Volan, SP?

He would like to understand a bit more, and some of that's your story to tell, if you want to. I said I'd ask you. He committed to action on this. We can also bring it up through Judy if you want - or anything else. I'm open to other ideas / paths. Whatever you are comfortable with, please let me know. I told Ron I'd let him know what you are comfortable with.

4:59:04 PM Joren: I hope this is helpful. If not, please let me know.



**PTE 25 (04/09/2024 D. Hackman Dep. pp.
31(117)-32(1120)).**

7 Q. Okay. What's the next memory you
8 have?

9 A. Sure. I remember there -- I had a
10 coworker named Bill Gallagher who was also an
11 electrical engineer. He worked in my group. I
12 believe after the 2016 presidential election, for
13 quite a while after that, he had as his computer
14 desktop an image of a woman in a very skimpy
15 bikini with a photoshopped head of Sarah Palin on
16 it. And I heard him remark a couple times he
17 really loves that picture and thinks it's so cool
18 and funny. I found it to be really distasteful
19 and inappropriate for work.

20 What else?

21 Relating to Bill Gallagher, one
22 time -- I don't remember when this happened,
23 actually. It was probably within maybe the last
24 couple of -- maybe within the last year or two of

DANIEL HACKMAN

Page 32

1 my employment there. We had a lot of potential
2 investors, current investors, people like that
3 would come in and out frequently for meetings.
4 And one -- on one occasion one of the investors
5 who came in led Bill, Mr. Gallagher, to make some
6 comments about her appearance and that he found
7 her to be extremely physically attractive.

8 After she walked past our desks into
9 the conference room, shortly after he kind of came
10 walking by, like, making small talk with some of
11 us about, hey, did you get a load of that -- that
12 hot girl who just walked in? Oh, man. That kind
13 of thing.

14 So these are examples of -- these are
15 some examples, I guess, of sort of an attitude
16 that I have observed in some employees that don't
17 maybe paint their relationship to women in -- in
18 the best light.

19 I -- I can probably think of some
20 other examples to talk about.

**PTE 26 (04/09/2024 D. Hackman Dep. p.
37(113-17)).**

3 Okay. So another example, I had a
4 coworker, Mr. Haggerty. On at least two occasions
5 I heard him relate a joke to me. He talked about
6 how the company used to have an intern working
7 with the electrical engineering team, and this
8 intern was a young woman who I -- I can't recall
9 her age. She was probably college age. And
10 Mr. Haggerty related that on one occasion he had
11 asked her to do some soldering for him. And he
12 said that she was wearing shorts and open-toed
13 shoes. He said that he told her that she should
14 spread her legs so that if any solder dripped, it
15 would drip onto the floor and not on to her legs.
16 And he then laughed about how he made a comment to
17 a very young woman about spreading her legs.

**PTE 27 (04/09/2024 D. Hackman Dep. pp.
123(114)-125(1118)).**

4 BY MS. ACEY:

5 Q. Did Mr. Wolgemuth ever disclose
6 personal matters while at work?

7 MR. LONGO: Objection. Form.

8 THE WITNESS: Frequent. Frequently,
9 yes.

10 BY MS. ACEY:

11 Q. Can you give an example?

12 MR. LONGO: Same objection.

13 THE WITNESS: He would talk about his
14 family a lot and his wife and his children.
15 He would talk about projects he was doing,
16 working on at home. Things like that.

17 BY MS. ACEY:

18 Q. Did you ever find any of his
19 disclosures to be inappropriate for work?

20 MR. LONGO: Objection. Form. And
21 beyond the scope of direct examination.

22 THE WITNESS: I can't recall. I
23 don't -- I don't remember.

24 BY MS. ACEY:

DANIEL HACKMAN

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1 Q. Have I ever complained to you about
2 John Wolgemuth?

3 A. Yes.

4 Q. Do you recall what I was complaining
5 about?

6 MR. LONGO: Objection. Form. And
7 beyond the scope.

8 THE WITNESS: I remember you
9 complained about some comments he made about
10 his wife and, sort of, what her roles and
11 responsibilities as a wife ought to be.

12 BY MS. ACEY:

13 Q. In this deposition were you asked to
14 testify to complaints that I have made to you that
15 related to sexual harassment?

16 A. I believe that I testified about -- to
17 that effect a lot, yes.

18 Q. Okay. Have you heard -- did you ever
19 hear -- I'm sorry.

20 Is there anything in your experience
21 that you felt supported -- I'm sorry.

22 Can you just go into more -- do you
23 know what I was complaining to you about John
24 Wolgemuth with his -- I'm sorry. I need to take a

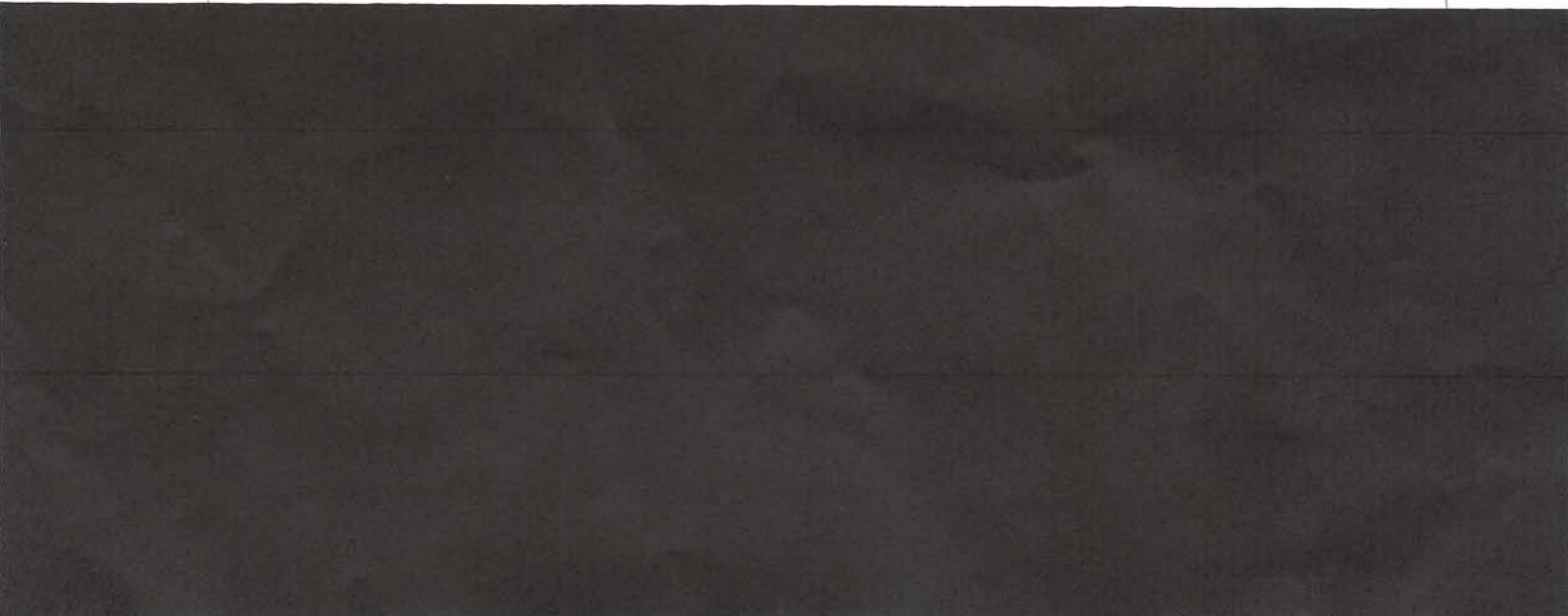
1 second because my brain is turning into mush. One
2 second, everyone.

3 Did you ever hear or see anything
4 relating to -- no. I just want to scratch that
5 question.

6 Has John Wolgemuth ever expressed his
7 views on his wife to you?

8 MR. LONGO: Objection. Form. Beyond
9 the scope.

10 THE WITNESS: I think he would make
11 some passing comments sometimes about --
12 about what he believed her appropriate role
13 as a wife and mother ought to be. To go into
14 more detail, I guess, it would have been
15 comments like that -- it would have been
16 comments to the effect of that -- that she
17 should be content being a housewife and
18 making babies, basically.



PTE 28 (09/09/2021 Teams Messages between myself and my Supervisor, Doc 40 Transcript (I)(4), *originals filed in Doc 40-2 pp. 35-36*).

4. 09/09/2021 Present sense impression from myself to my supervisor about gender concerns towards Ron Turi

(Exhibit 18). References ECF 8-1 (¶ 175).

5:22:35 PM Assata: Jerry doesn't seem to want me alone with Ron... idk whag that's about

PTE 29 (04/08/2024 M. Tabbut Dep. pp.

163(1114)-166(111)).

14 Q. One second. I'm trying to read my
15 notes. Okay. Earlier in the deposition, did you
16 testify to Rob S. not following specs -- not
17 following your specs?

18 MR. LONGO: Objection. Form.

19 THE WITNESS: Yes.

20 BY MS. ACEY:

21 Q. Okay. So were there quality
22 checks done in the field?

23 MR. LONGO: Objection. Form.

24 THE WITNESS: I don't believe so.
25 I don't remember.

1 BY MS. ACEY:

2 Q. Was anyone assigned -- oh, I'm
3 sorry.

4 Were you aware of any connection
5 between InductEV and PAI?

6 MR. LONGO: Objection. Form.

7 THE WITNESS: Yes.

8 BY MS. ACEY:

9 Q. Do you recall what PAI did?

10 MR. LONGO: Objection to form.

11 THE WITNESS: Yes. They were a
12 contract manufacturer who built our coils and
13 cabinets.

14 BY MS. ACEY:

15 Q. Did the quality team have any
16 interaction with PAI?

17 MR. LONGO: Same objection.

18 THE WITNESS: Yes.

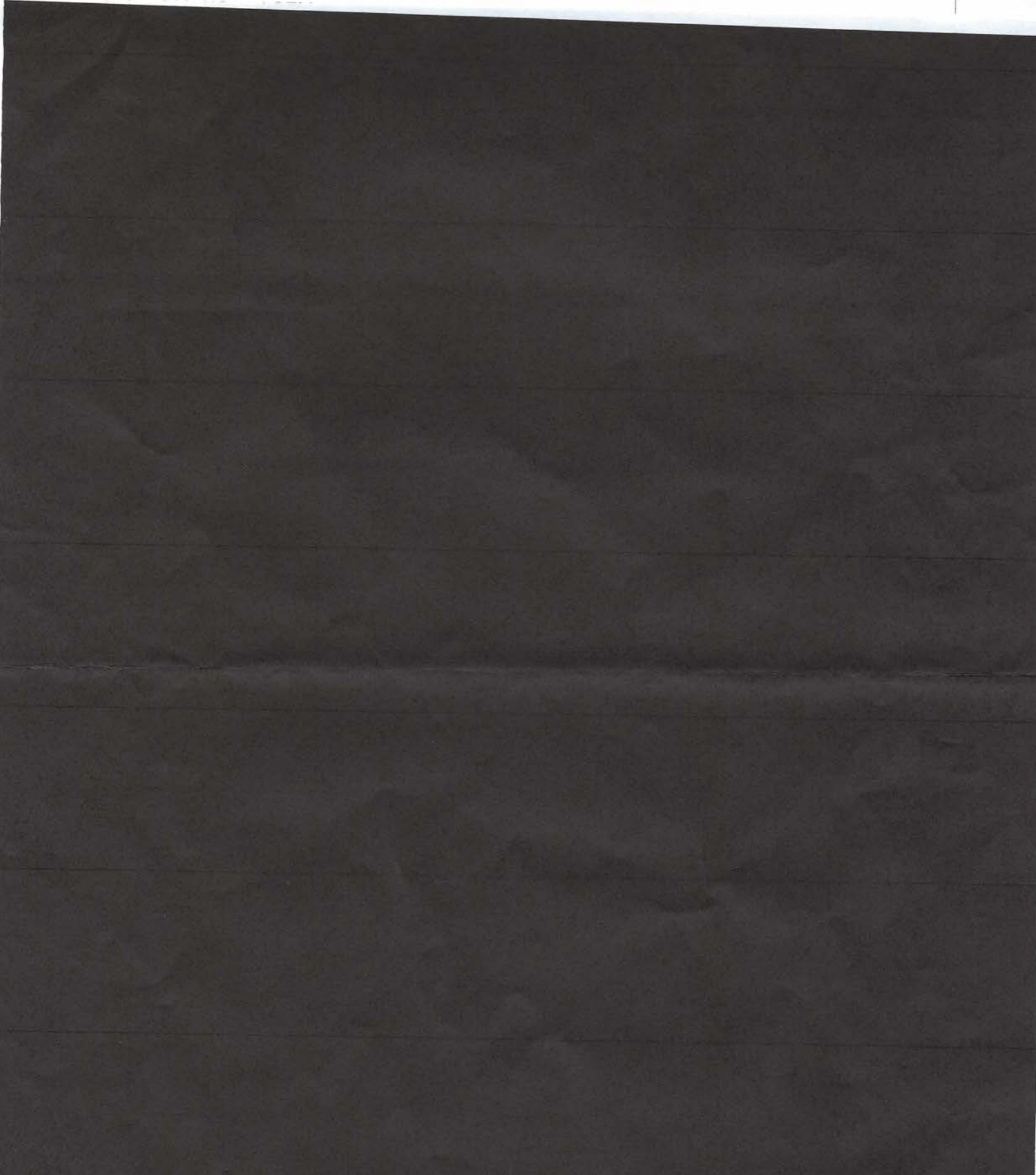
19 BY MS. ACEY:

20 Q. Do you recall any quality checks
21 over PAI's product?

22 MR. LONGO: Same objection.

23 THE WITNESS: I think there were,
24 but I don't know how much -- I don't know what was
25 checked there.

1 most of the time it wasn't replied to.



PTE 30 (04/12/2024 Judy Talis Certification).

CERTIFICATION OF JUDITH TALIS

1. I am a former employee of InductEV and Momentum Dynamics.
2. On April 8, 2024, Ms. Acey asked me to answer the following questions, under oath:

Questions:

1. Is there any instance Ms. Talis can recall where she stuck up for or protected Ms. Acey from a racially charged action or comment while working for InductEV/Momentum Dynamics?

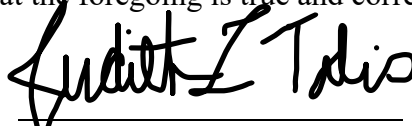
Answer: Any incident involving Ms. Acey that was brought to my attention was investigated and documented. I do not recall the specifics, but the company's documents would reflect my personal involvement in the matter, if any.

2. Did Ms. Talis ever address or otherwise personally follow up on a statement made by Bob Sweirzawski, that I was from "the wrong side of the tracks"?

Answer: I recall there was a matter in which Mr. Sweirzawski had some role. I do not recall the specifics regarding that matter or if it pertained to the statement referenced above. If that matter involved a complaint of some sort, it would have been investigated and documented by the company.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 4/9/2024.



Judith Talis

**PTE 31 (09/20/2021 90-day Check-in Invite
Screenshot, doc. 111-1).**

10:45

22%



Deleted



Joren Wendschuh

10/1/2021

QA / Engineering

Follow up from 9/15 meeting. Rescheduli...

7



Thu, Oct 7, 2021, 9 AM (56m)

RSVP



Joren Wendschuh

9/30/2021

One on one

Microsoft Teams meeting Join on your co...

2



Fri, Oct 1, 2021, 9 AM (43m)

RSVP

**[Draft]** (no recipients)

9/29/2021

Europe (50Hz) 3 Ton (150kW only) wire change.

Do you wantthes From: Joren Wendschuh ...

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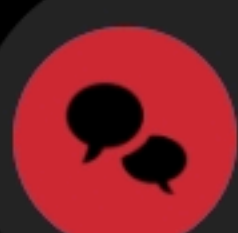
Joren Wendschuh

9/21/2021

Team Discussion

Adding in field techs for when in office as ...

3

Wed, Sep 22, 2021, 10 AM
(25m)

RSVP



Diana Wilmes

9/20/2021

Assata Acey & Judy - 90 Day Check In

2

Wed, Sep 22, 2021, 10:15 AM
(30m)

RSVP

**[Draft]** (no recipients)

9/17/2021



Mail



Search



Calendar



PTE 32 (04/11/2024 A. Acey Dep p.283(114-19)).

4 Q. Do -- do you know whether or not
5 anyone in management, Joren, Ms. Talis, spoke
6 with Bogdan about the things you've been
7 describing?

8 A. I don't believe Joren spoke with
9 Bogdan. He would always report to me if he
10 ever did anything to help the situation, and
11 with Bogdan he did not, except for that --
12 that situation we just disclosed with the --
13 the multimeter. That's when he made a
14 general comment to Engineers about touching
15 products, but it wasn't centered on Bogdan.

16 And I don't know if Judy ever spoke
17 to Bog- -- Bog- -- Mr. Proca because Judy, as
18 far as I knew, had waived off my complaint to
19 her.

**PTE 33 (04/11/2024 Acey A. Deposition pp.
101-103).**

1 A. If they can make a decision and
2 compare people in the same role with
3 different qualifications that are only
4 different in race, then, for me that's
5 racial.

6 At the same time when I told Judy
7 Talis about racial experiences, she chose not
8 to address it until, like, four months after
9 I told her. So whatever harassment I
10 experienced, I continued to experience until
11 I could not work there anymore, until my
12 disability took over.

13 Same thing with sexual harassment.
14 Bogdan did all these things to me. And when
15 I spoke to Judy Talis, she dismissed it.

16 Q. What all did Bogdan do to you?

17 A. Bogdan sat in the -- and I'm sorry
18 if I'm talking you off track of your
19 questions.

20 Q. You are.

21 A. But I'll answer this one as
22 succinctly as I can.

23 Bogdan by action he made
24 inappropriate comments during diversity

1 training. He's stared and leered at me at
2 several inappropriate times and he continued
3 to either invade my professional space and
4 cause me to feel physically unsafe.

5 Q. Did you bring this concern up with
6 Joren?

7 A. Yes.

8 Q. Did he address it?

9 A. He did his best.

10 Q. Did it stop after Joren addressed
11 it?

12 A. No.

13 Q. You brought it up, you say, with
14 Ms. Talis?

15 A. Yes.

16 Q. And did it stop after you brought
17 the issue or concern up with Ms. Talis?

18 A. No.

19 Q. So how many times did you feel that
20 Mr. Bogdan was looking at you
21 inappropriately?

22 A. Countless.

23 Q. Okay. How many -- what else is it
24 that Mr. Proca did that you feel, you know,

1 was harassment or created an offensive
2 environment for you?

3 A. Those examples I just gave to you.

4 Q. Do you have any -- did Ms. Talis
5 ask you to give you examples in writing of
6 your concerns around that kind of thing?

7 A. Never.

8 Q. Okay. Did you ever report these
9 concerns in writing to Ms. Talis or to
10 Jor- -- Joren?

11 A. They were written in those messages
12 to Joren, and they were conveyed orally to
13 Ms. Talis.

14 Q. And these would be messages you
15 provided -- in your documents and things you
16 provided what you believe to be those
17 messages, correct?

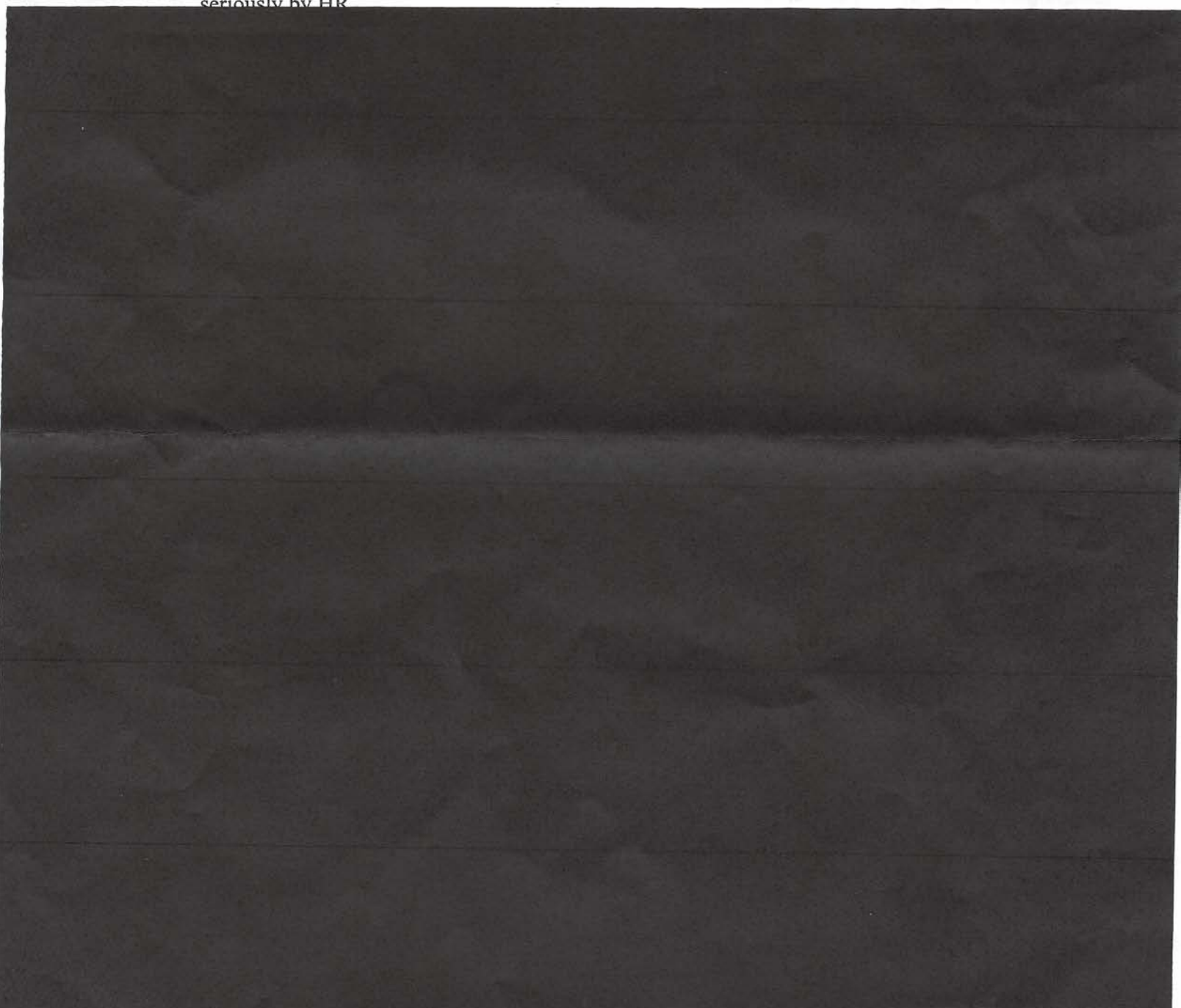
18 A. Um, that's the evidence you gave to
19 me. I just copy pasted it into the
20 transcript.

21 Q. My question is: Did you provide
22 the evidence that you think supports your
23 claim?

24 A. Oh, yes.

**PTE 34 (03/14/2024 Complaint, Doc 8-1 pp.
13-14).**

24. At one point, during my 90-day check in, I expressed concern about sexual harassment at work and how I appreciated having my supervisor's support.
25. After CAO admonished me for relying on my supervisor instead of her, I described an experience with a senior member of the electrical engineering team, Bogdan Proca, who had:
- a) Stared me down in orientation before commenting on relationships between subordinates and superiors being "natural".
 - b) Compared me to dark chocolate in front of another colleague during a company ice cream day.
 - c) Pursued me from across the lab while asking if we were the only employees left in the building.

26. In response to the fear and discomfort I described, CAO launched into an anecdote about a male worker staring at a female worker's breast; how they became close friends after the female worker learned that the male's "unconscious staring" was caused by autism.
 27. CAO's response stuck with me throughout my time at Defendant.
 28. As I continued to hear sexist comments by Electrical Engineer John Wolgemuth and experience discomfoting stares from Proca, no level of sexual harassment, even an "accidental" grazing by PCB designer Mike Russel felt significant enough to be taken seriously by HR
- 

**PTE 35 (04/28/2021 Interview Evaluation
from Bruce Mitchell, Defendant's AA-9).**



Interview Evaluation Form

Candidate Name: Assata Acey
Interviewer: Bruce Mitchell
Position: Sr tech
Date: 4/28/2021

- 1.) **Culture Fit:** Candidate's beliefs and behaviors align with the company's core values and company culture.

Rate the candidate on a 1-5 scale (1 = not a fit; 5 = perfect culture fit)

1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☒

Please comment on the reason for your rating:

Seems they have a good engineering mindset of thinking how and why components work and understanding it. Expressed her interest in why material science and physics play a role in her interest of this job field

- 2.) **Skill/Competency Fit:** Do the skills the candidate will bring to the job align with the job competencies?

Rate the candidate on a 1-5 scale (1 = not a fit; 5 = perfect skillset)

1 ☐ 2 ☐ 3 ☒ 4 ☐ 5 ☐

Please comment on the reason for your rating:

Seems to be still honing and practicing her skills after graduation, possible she was limited on what she was allowed to do from previous employers but doesn't seem to fully fit the skills for a Sr tech role



- 3.) **Technical Fit:** Does this candidate have the technical aptitude needed to succeed in this position?

Rate the candidate on a 1-5 scale (1 = not a fit; 5 = perfect technical fit)

1 ☐ 2 ☐ 3 ☒ 4 ☐ 5 ☐

Please comment on the reason for your rating:

would need to be trained still on certain technical abilities- seemed to have little tool knowledge and experience, wiring, cabeling stripping and crimping which are needed for a senior tech role

- 4.) **Overall Fit:** Average your ratings and please select yes or no on moving forward with this candidate.

Average Rating: 6/10

Yes ☒ No ☐

Overall Comments:

Had a great attitude and personality, willing to be hands on, be here in person everyday which is what this team needs. Definitely seems to fit a engineering position instead of a senior tech role

**PTE 36 (04/11/2024 A. Acey Dep. pp. 24(119)-
29(1121), pp.83-88(1110), pp.159(1111-pp
161(1120)).**

9 However, in a -- a subsequent round
10 of interviews, I was looked at by a former
11 co-worker, Omar Jackson, and I think it was
12 Bruce -- I don't know his last name. It was
13 the guy I was supposed to replace.

14 And during the video interview at
15 that round, Bruce started asking me questions
16 that seemed to be answered on my résumé.
17 Basically, whether I knew how to use a hand
18 tool, if I had seen a screw driver, and the
19 contradiction seemed kind of obvious because
20 at that point I had already discussed with
21 him about, like, putting together lasers for
22 a lab, or even work I had done around the
23 house, as far as, like, cutting wood, sanding
24 wood, screwing things together, designing

1 things.

2 And, so, that he would -- he would
3 hear those examples and ask such a
4 rudimentary question, it just didn't make
5 sense to me.

6 Q. And you determined that at the time
7 that you had this interview with Bruce?

8 A. I marked it as strange. And, then,
9 I spoke with -- I wasn't sure it was gender
10 or race, really. So Bruce --

11 Q. Well, do you think that both are
12 the same, or do you have some independent
13 sense that there was some kind of independent
14 discrimination -- and we'll include
15 harassment of you because of your race.

16 A. Okay.

17 Q. -- separate from that of gender, or
18 is -- are they all the same?

19 A. In this specific instance, not
20 knowing Bruce, the only thing I could look at
21 in difference between me and him was that I
22 was black, and he was not and that I was a
23 woman, and his co-workers were all men. His
24 supervisor was a man.

1 Q. Did you, then, from that -- those
2 facts infer that his question having had an
3 answer available in your résumé, and if he
4 had reviewed those and the other things that
5 you've identified, constituted possible
6 harassment or discrimination towards you
7 based on your race and gender?

8 A. I wouldn't say it was harassment.
9 I -- I think it was discrimination.

10 Q. "Discrimination"?

11 A. So I marked it as biased. He
12 didn't have any reasonable -- other --
13 usually, when I talk to someone and engage
14 with him and the only explanations I can come
15 to is either a lack of intellect or bias, I
16 tend to lean towards bias. But also, like,
17 in my experience, women tend to be
18 stereotyped against knowing how to use tools.

19 And, so, it's not the first time
20 someone -- I mean, even -- I go to Lowe's
21 people. Follow me at Lowe's. I work on my
22 car. People ask me if I need advice.

23 So, from my experience of that
24 pattern and the source of what he was

1 commenting on and the information I presented
2 to him, and the differences I could note
3 between myself and him, that's what I found.
4 I mean, his co-worker, Omar Jackson, had no
5 problem, and Omar was also a man.

6 Q. Well, is it your -- do you, then,
7 when you receive information or are spoken to
8 in a particular way by somebody or treated in
9 a particular way by somebody -- and we'll
10 stick to work situations --

11 A. Okay.

12 Q. -- do you disagree with what you're
13 hearing, or think it doesn't make sense, you
14 attribute it to either a lack of intelligence
15 or concentration or alternatively too bias?

16 A. Can you repeat that question.

17 Q. Well, I'm trying to understand your
18 testimony. I think -- did you just tell us
19 that when somebody asks you something or
20 engages in conduct towards you that you feel
21 is unwarranted or possibly reflects
22 discrimination, that -- that your evaluation
23 is, "Well, is that either because of lack of
24 knowledge or intelligence or alternatively if

1 it's not that, that it's bias"?

2 A. Right. If it comes down to those
3 two, then, I tend to lean towards bias.

4 Q. And isn't that what -- that's --
5 that's in citing the questions from
6 Mr. Bruce -- or Bruce, I think, is his first
7 name, but in citing those questions you came
8 to the conclusion that that was probably one
9 of the first incidences of you being
10 subjected to discrimination based upon race
11 and gender at InductEV, because Mr. Bruce --
12 because Bruce, if he had read your résumé and
13 done his homework, would have known that you
14 have experience with power tools?

15 A. Yes. Or if he had just listened to
16 what I was saying in review of the résumé.

17 Q. And, so, him asking about that,
18 most likely, was a result of bias towards you
19 based upon your gender and race?

20 A. Yes. I will also note that when he
21 asked about my use of power tools, it was
22 not -- I guess, people speak musically,
23 right, and -- and that tone is that -- the
24 words kind of go up and down in tone

1 sometimes to show a question or a comment.

2 And when he asked me if I had used
3 power tools, the way he had emphasized the
4 word and the way he had looked up gave me the
5 impression that it wasn't just a casual, "How
6 do you use it, do you know how to use it, I
7 forgot to ask you, but more so I don't
8 believe you've used it. All this other stuff
9 you're saying is great, but can you do the
10 basics?"

11 Q. And this Bruce, he was the person
12 you would be replacing?

13 A. Yes.

14 Q. All right.

15 And was he in any kind of a
16 position to decide at the end of the day
17 whether or not you got hired?

18 A. At the time, I was not aware. All
19 I knew was that these were some of the people
20 interviewing me as a part of InductEV's
21 hiring process for that role.

1 A. Okay.

2 Q. Ms. Acey, I'm going to show you
3 Exhibit AA-8, which appears to be an
4 "Interview Evaluation Form," similar to the
5 form that we just looked at.

6 Interviewers are indicated as,
7 "Omar and Bruce."

8 Do you see that?

9 A. Yes.

10 Q. And, basically, do you recall that
11 you had some kind of a interview or a session
12 with those two individuals on or about
13 April 28th, 2021, as part of your interview
14 process?

15 A. Yes. This is the interview I told
16 you about earlier with Bruce.

17 Q. And if you look at the second page,
18 essentially, as far as comments go, the only
19 comment that's given is that you, "seem to
20 know what she's talking about. I believe she
21 was transparent during the interview."

22 Do you see that?

23 A. Yes.

24 Q. And you received two 5s and a 4

1 from Omar and Bruce, right?

2 A. Yes.

3 Q. Do you know if that was the
4 interview where Bruce asked you the questions
5 you talked about earlier regarding, you know,
6 use of tools, familiarity with tools, that
7 made you uncomfortable?

8 A. Yes.

9 Q. Okay. But it doesn't appear that
10 he, you know, made any comment relative to
11 same, then, on this Evaluation Form, AA-8,
12 that were completed by Omar and him, right?

13 A. No, it doesn't.

14 Q. Okay. Do you know somebody named
15 Bruce Mitchell, or did you work with someone
16 named Bruce Mitchell during your time at
17 InductEV?

18 A. I don't think so, not by the name.

19 Q. Okay.

20 A. Maybe that was Bruce's last name.
21 I don't know.

22 Q. Do you recall working at -- or at
23 least being interviewed by somebody named
24 Bruce?

1 A. Yes.

2 Q. Okay. And, now, these most recent
3 exhibits that I've shown you are dated
4 April 28, 2021.

5 Is that a particular -- did you,
6 you know, meet with these people that are
7 identified on the evaluation forms for some
8 kind of interview at that time? And just to
9 help you out, the Ryan Taggart form is --

10 A. Right, I see it.

11 Q. -- May 14th?

12 A. Right.

13 Ryan Taggart was the final
14 interview. Omar and Bruce interviewed me --
15 I think that was after the phone call with
16 Joren. It was, yeah. So it looks -- it
17 seems right, the date.

18 Q. Okay. All right.

19 Do you recall what was the format
20 of the interview that was held on or about
21 April 28th, 2021, which ostensibly these
22 comments originate from?

23 A. Okay. It was a virtual interview
24 over Zoom. I had a series of interviews

1 scheduled with Momentum on that day, and I
2 saw Omar and Bruce via Zoom.

3 They appeared, I guess, to be
4 sitting in their independent cubicles. They
5 asked me questions, and that was it.

6 - - -

7 (Whereupon, Exhibit AA-9,
8 Momentum Interview Evaluation Form
9 Dated 4/28/21, was marked for
10 identification.)

11 - - -

12 BY MR. SCHAUER:

13 Q. So I'm going to show you Exhibit
14 AA-9. AA-9 is, again, another Interview
15 Evaluation Form; Interviewer, Bruce Mitchell;
16 date, 4/28/21.

17 A. (Witness reviews document.)

18 Q. Now, with regard to the individual,
19 Bruce, that you've identified, do you have
20 any reason to believe that Bruce harbored any
21 particular animus against people of color or
22 women?

23 A. Other than what I described to you
24 earlier, no.

1 Q. Okay.

2 A. I -- I didn't think he had any
3 animus towards people of color that I knew of
4 specifically.

5 Q. Okay. On the second page,
6 Paragraph 3, second page of Exhibit AA-9, the
7 comment says, "Would need to be trained still
8 on certain technical abilities- seemed to
9 have little tool knowledge and experience,
10 wiring, cabling, stripping and crimping,
11 which are needed" to a senior -- "for a
12 senior tech role."

13 Do you see that?

14 A. Yes, I do.

15 Q. And do you -- for the reasons
16 identified earlier, do you disagree with that
17 statement, or not?

18 A. I disagree that those were needed
19 for the senior tech role. I don't really
20 see -- I feel, like, most of it is
21 subjective. I don't really think he was
22 wrong to say those things. I don't think
23 they were objectively wrong, except for the
24 senior tech role, that's the one that

1 didn't -- it doesn't click for me.

2 Q. Well, in the fourth section of this
3 AA-9, the Interview Evaluation Form, it says
4 that, "had a great attitude and personality,
5 willing to be hands on, be here in person
6 every day, which is what the team needs.
7 Definitely seems to fit a engineering
8 position instead of a senior tech role."

9 Do you see that?

10 A. Yes, I do.



11 Q. Did you come away from this
12 interview going like, "I don't know if I want
13 to work with this woman"?

14 A. I did have doubts about the
15 company --

16 Q. Okay.

17 A. -- the entire company.

18 Q. And did you express them to Joren
19 or anybody else?

20 A. I complained about Bruce to Joren,
21 and I complained about Bruce to Judy, but she
22 writes about it as a joke in this interview
23 evaluation.

24 But other than that, I didn't,

1 like, decide to tell them about
2 theirselves [sic], or anything like that, no.

3 Q. She says, "She has been hands on at
4 her work."

5 Do you see that?

6 A. Where -- I'm sorry.

7 Q. On the next-to-the-last line of
8 A-11 -- AA-11-A?

9 A. AA-11-A -- okay.

10 Q. Do you see that?

11 A. Yes.

12 Q. Okay. Now, that's not what you
13 complained about Bruce saying, right?

14 I mean, she says you've been hands
15 on in your work, right?

16 A. Right.

17 She referred to Bruce as a joke in
18 Section 2.

19 Q. Okay.

20 A. Yeah.

21 Q. Well, let's -- you don't have that
22 circled, so I was trying to save time and not
23 focus on it. What -- what is it you're --
24 what's your -- the significant of you

1 pointing out on Section 2 of the first page
2 of Exhibit AA-11 that -- this --

3 A. Well, you --

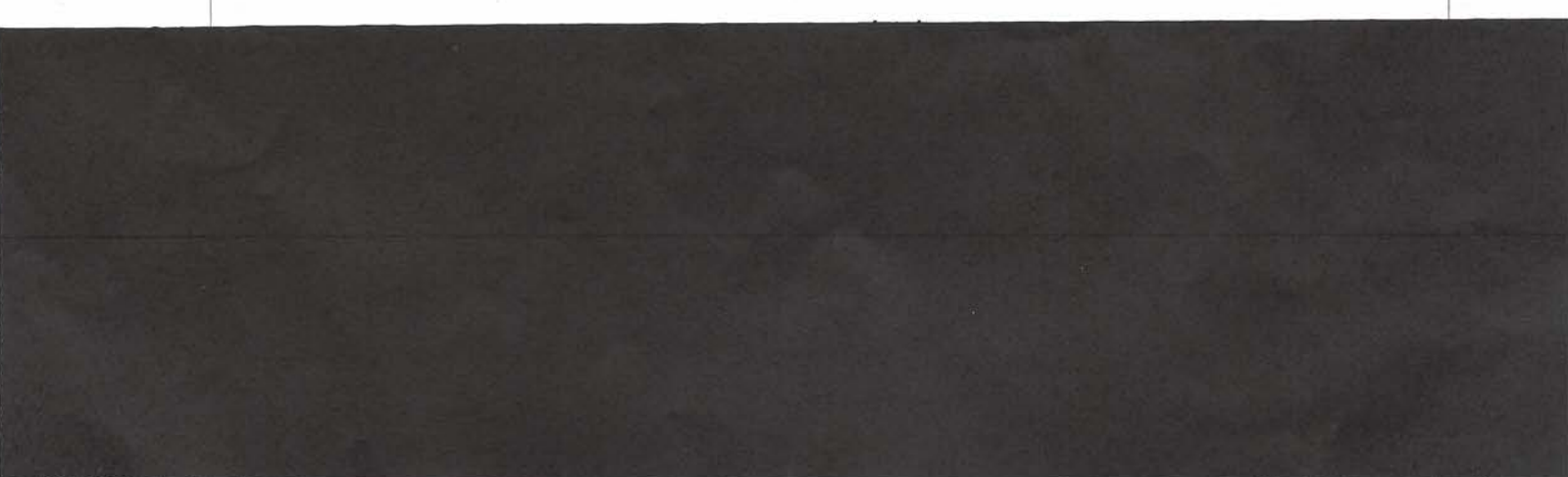
4 Q. -- she mentioned --

5 A. Right. She made a joke. She
6 didn't -- well, sorry. You're right.

7 She mentioned when the interview
8 team, which I assume to be Omar and Bruce,
9 asked her about her use of tools, as I
10 disclosed to you all earlier, she made a
11 joke. She didn't think they understood.

12 That wasn't a joke. I was
13 complaining about Bruce. I actually
14 complained about Bruce to Joren. He thought
15 it was strange. I told Judy, and she writes
16 it as a joke.

17 I didn't circle it, because for me,
18 like, this -- the stuff I circled to me said
19 more about how she saw me. This to me says
20 more about how she handles complaints.



PTE 37 (02/11/2022 Teams Messages between myself and my Supervisor, Doc 40 Transcript (II)(27), *originals filed in Doc 40-2 pp. 614-636*).

27. 02/11/2022 Present sense impression and excited utterances from myself to my supervisor of the nature of why I needed to work from home as well as CAOs request to follow up on our discussion of racial harassment and her subsequent sexually inappropriate behavior (Ex. 306-316). References: ECF 8-1 (¶¶33-43), Doc 15 (¶¶77-80), ECF 15-48, ECF 15-54.

8:22:37 AM Assata: A bit slow this morning. Woke up in hormonal nausea. Escalated and spent the last 15 mins in fetal position on the floor. Yay *sad emoji*

8:22:54 AM Assata: Will still sign in for meeting

12:15:45 PM Assata: Update:

I did not get better I am well Aqainted with Dan's Clorox

Judy randomly asked to follow up. She barely stopped herself from asking if I was pregnant. After the implicitly then obligatory explanation of hormonal nausea...

She doesn't understand why I won't take her recc for her or her daughters gynecologist

12:17:23 PM Assata: I am sitting in a sun spot armed witha bowl and a bag. Will report as work related projects become more developed

12:24:11 PM Joren: WTF Judy? Ugh.

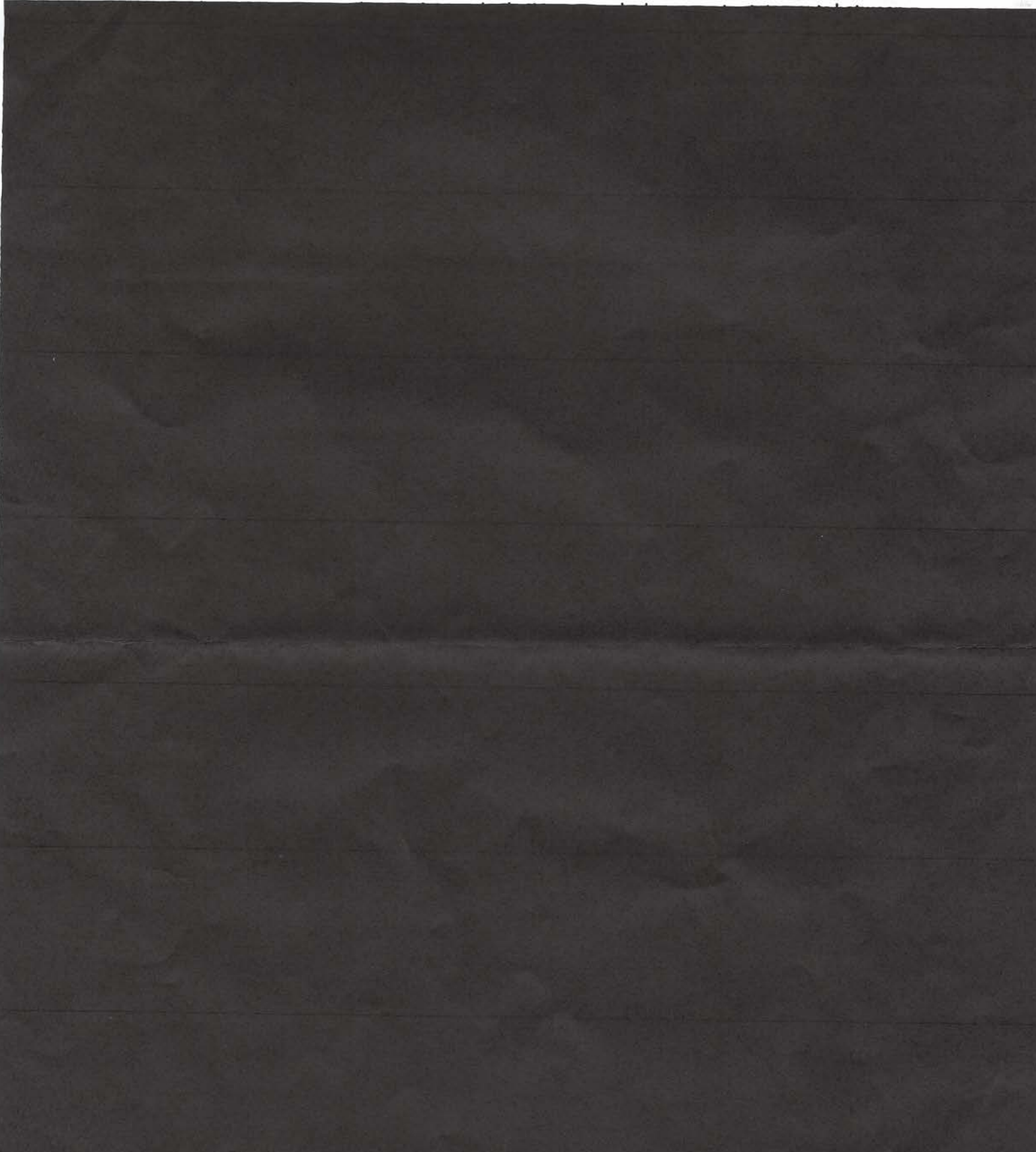
12:24:12 PM Assata: Worse is that cat has taken over the bag

12:24:21 PM Assata: *unproduced attachment*

12:24:37 PM Joren: Awwww That's so cute!!!

12:24:59 PM Joren: Oh yay!

12:25:10 PM Joren: Take some time and rest though, please



PTE 38 (11/16/2021 Teams messages between myself and my Supervisor, Doc 40 Transcript (III)(10), originals filed in Doc 40-2 pp.772-785).

10. **11/16/2021 Present sense impression and recorded recollection from myself to my supervisor about the concern for and investigation of the integrity of QA checks due to unexplained changes found on cabinets that I had already submitted for inspection (Ex 382-388). ECF 8-1 (¶18, ¶120-121(b-d), ¶124-129, ¶175-177), Doc 15 (¶77-80).**

7:56:53 AM Assata: The joint that was loose was supposed to be at 70-ft lbs. When pressed, water comes out, which means it was flow tested and passed flow test before this. I've seen Bob try in vain to loosen that amount and he wouldn't have been able to with a huge show of effort.

Possibilities

1. Was never tighten to 70 by pai and was tight enough to pass but just close to loosening(unlikely without tubingtk bring it low to leaking)
2. Was tightened to 70, passed testing amd loosened afterwards without mention.
- 3.(Extremely unlikely) failed test and we forgot about it.

I would propose flow assemblies have high torque joints checked and marked before install to display any shifts that may happen during or after testing.

8:04:48 AM Assata: Talked to Taylor, he said they do have a AC cabinet and Julian is bringing it up now.

8:08:34 AM Assata: ok I told Julian it'd be better to just wait since we know we have it downstairs and he'd just have to bring it up.

8:09:00 AM Assata: Also mistakenly asked Rob if he'd know any reason or anyone who could loosen these and he is upset

8:17:36 AM Assata: Hasn't snapped at me but is upset.

I mean 70 ft lbs is alot to loosen, but even if it were at 40ft lbs, it would still be tampering.

Reason 1: if it were loose enough to be two hand turns from water. It would have become gradually looser as hoses were added and removed

Reason 2: we also have some handsy engineers/folks who aren't afraid to poke stuff for presentation, or risk damage of products through multimeter tests.


I still conclude this it is post test.

I think proactively to protect against post test, poor construction, and unforeseen handling it may be best to

1. check the 70ft torque-points upon receipt (construction)
2. have them painted (indicator of handling)
3. Seal the cabinets before inspection. (Tampering) These do not protect against anyone stepping into test bay after Rob leaves each day suggestions welcomed there.

10:11:44 AM Joren: "I would propose flow assemblies have high torque joints checked and marked before install to display any shifts that may happen during or after testing."

This is excellent. Please do this. We **have** seen some of this in the field also, so please do, and see if we can update the document as well.



PTE 39 (04/03/2024 O. Jackson Dep. pp.

37(1114)-38 (1115)).

14 Q. Mr. Jackson, did you ever observe
15 Ms. Acey being treated in a way that you thought was
16 not appropriate during your time at InductEV?

17 A. I didn't see it, but I know she was
18 uncomfortable at times. She -- you know, I could
19 tell she was uncomfortable. I don't know why,
20 because I never asked; but I didn't see anything.
21 No.

22 Q. Okay. You didn't see anything, but you
23 saw that she appeared to be uncomfortable; right?

24 A. Yes. Yes.

25 Q. What --

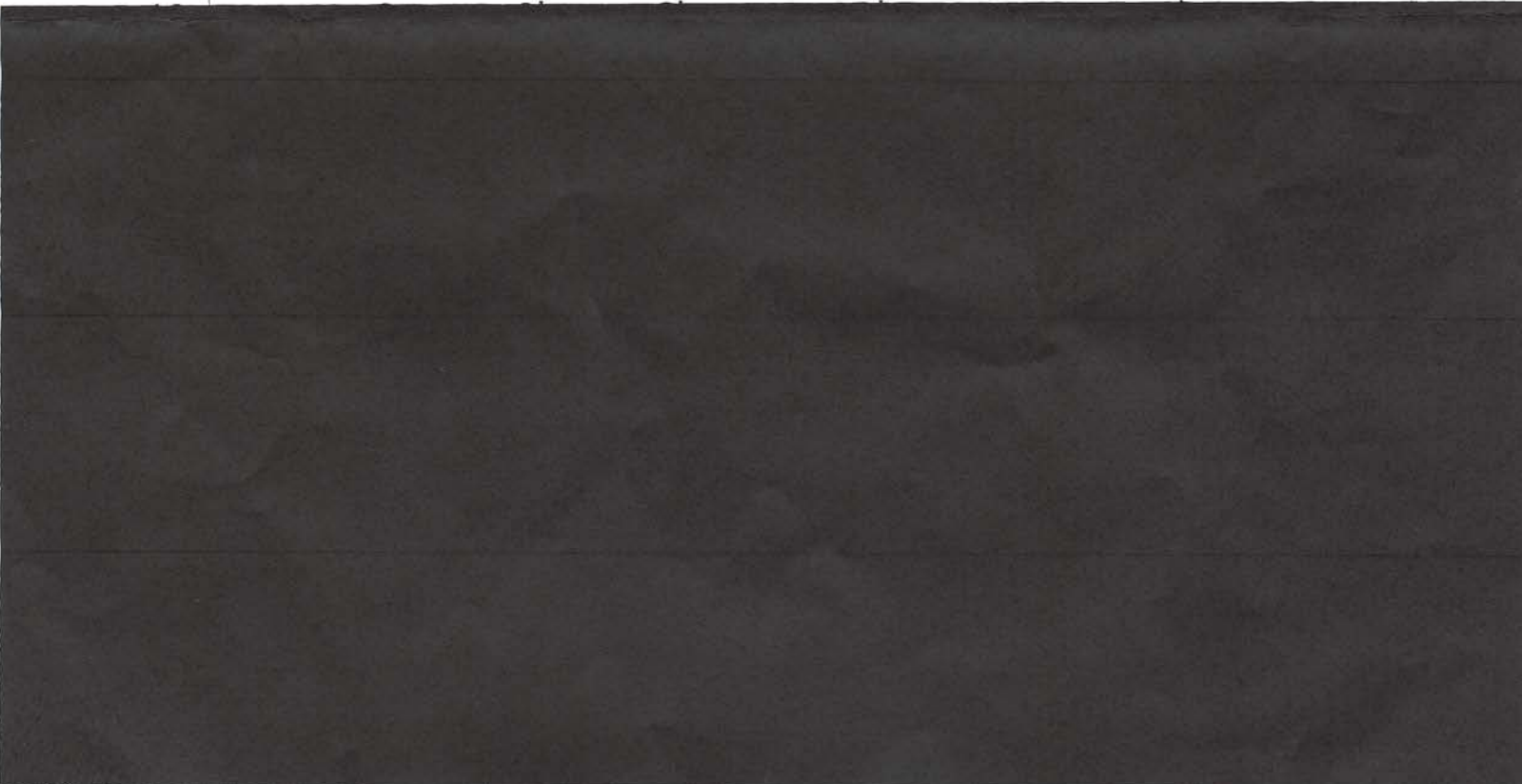
1 A. I'm sorry.

2 Q. What is it about what you saw with
3 respect to Ms. Acey's behavior that led you to
4 believe that she was uncomfortable?

5 A. Because she -- I guess the way she sat
6 inside the -- the cabinet one day. And she was just
7 in there, and she wouldn't say anything.

8 I went and ask her how she was doing.
9 She ignore me. She would always say something, but
10 that day she didn't. All I know whether she had
11 problems -- I mean, Joren was the guy that she would
12 talk to.

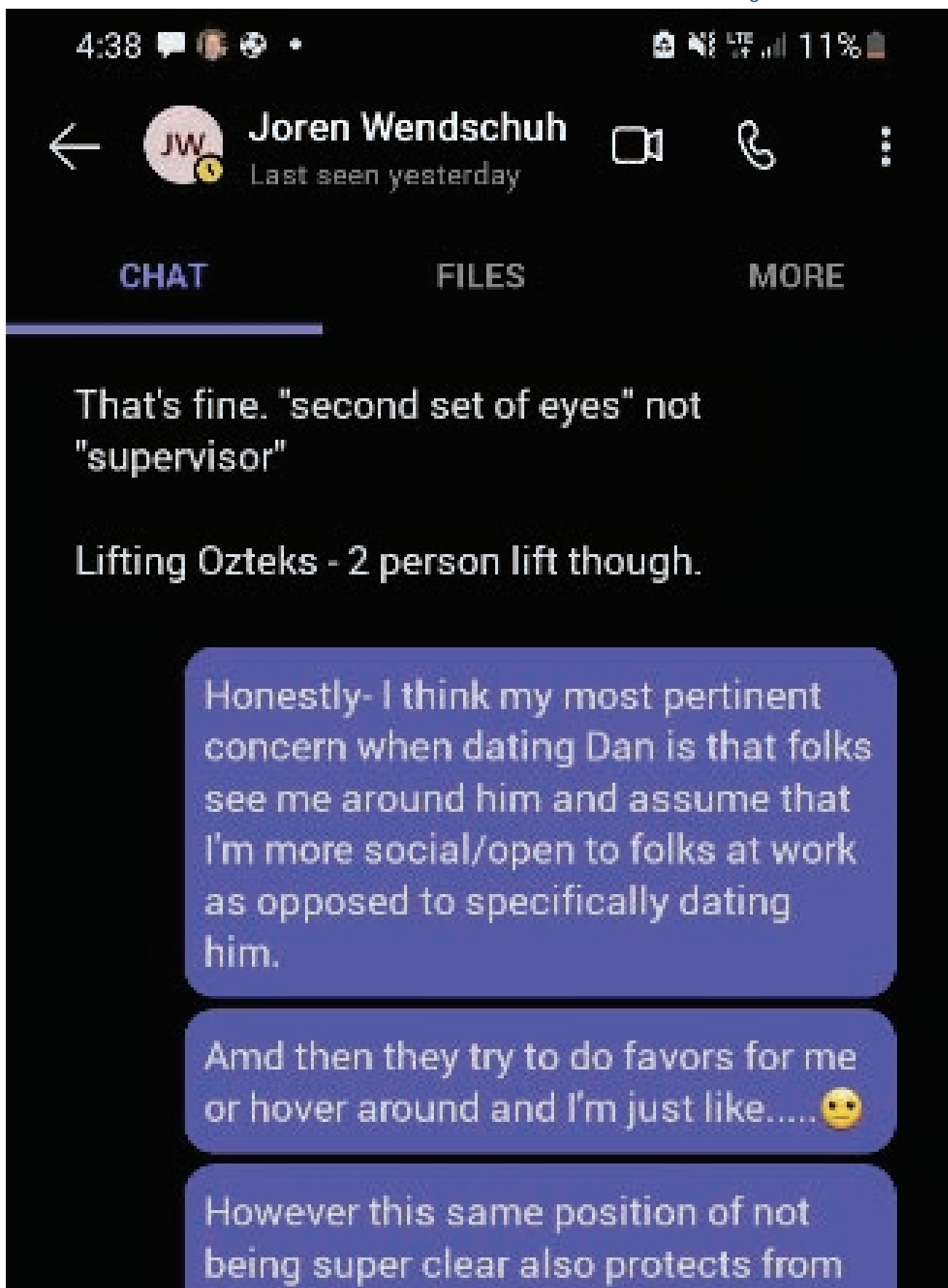
13 And so like, you know, I try to stay out
14 of things, so I never even asked. And, you know,
15 just didn't ask.



PTE 40 (02/23/2022 Teams and Text

Messages between myself and my Supervisor,

ECF 15-52(pp. 2-3) and ECF 15-53(pp. 2-3)).



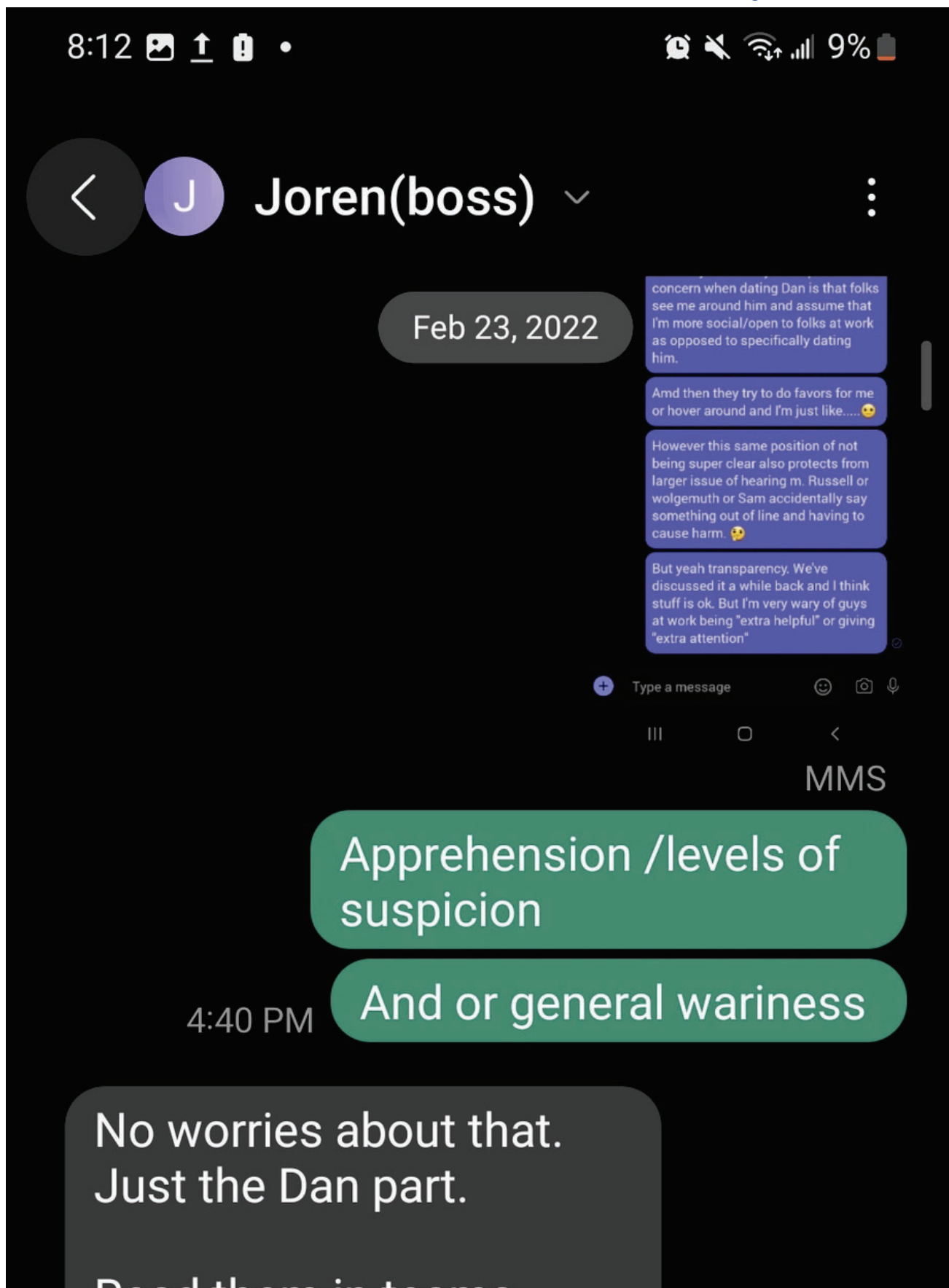
larger issue of hearing m. Russell or wolgemuth or Sam accidentally say something out of line and having to cause harm. 🤔

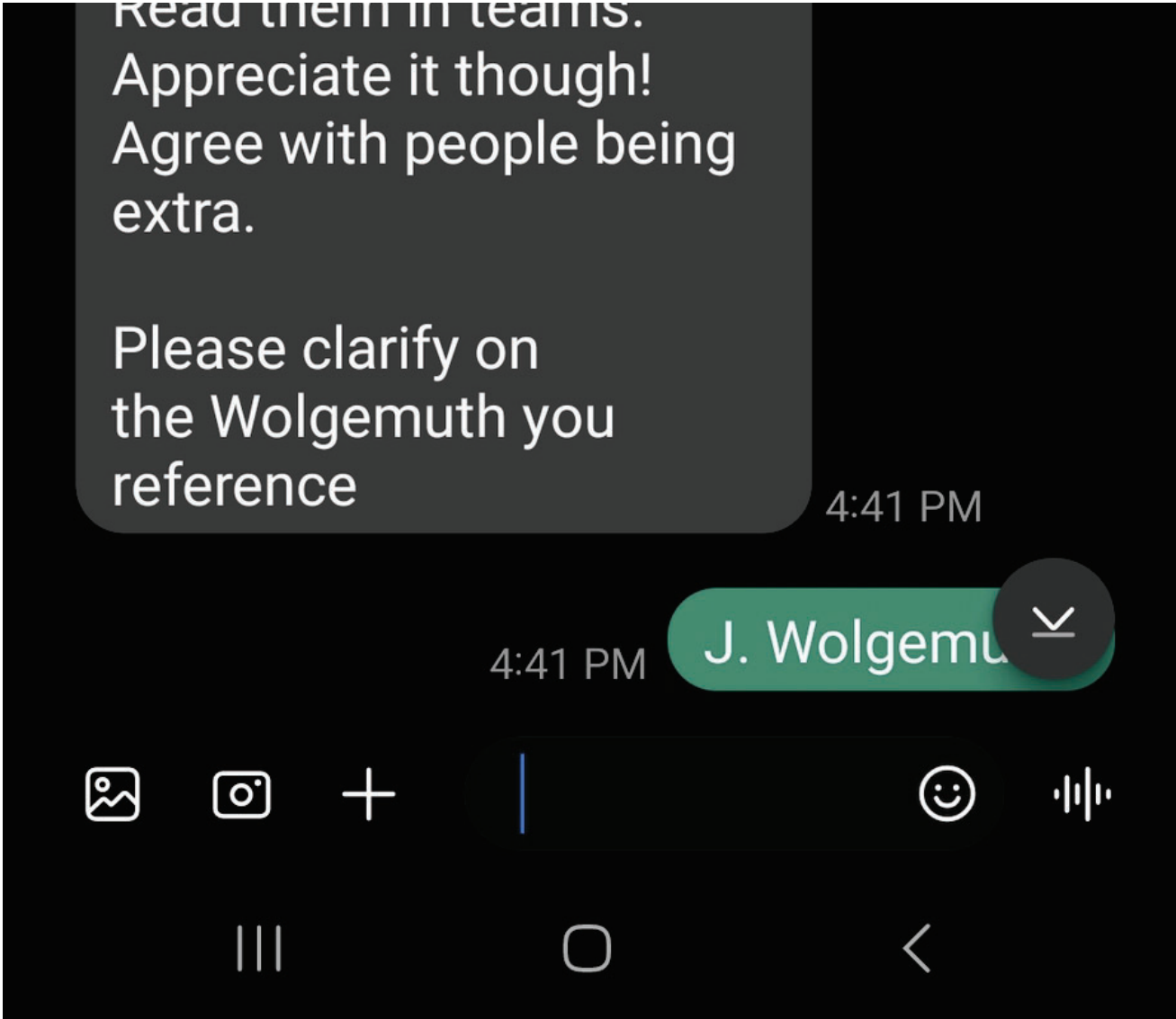
But yeah transparency. We've discussed it a while back and I think stuff is ok. But I'm very wary of guys at work being "extra helpful" or giving "extra attention" 🙄



Type a message







**PTE 41 (04/09/2024 D. Hackman Dep. pp.
49(1119)-51(1111)).**

19 Q. Let's start with Sam Gallagher.
20 What did -- why did she complain to
21 you about Sam Gallagher?
22 A. She complained that he -- she
23 complained that he seemed to be very forward with
24 her and almost as though he were trying to pursue

1 her romantically. Stopping by her desk often.
2 Inviting her to go with him to lunch often. She
3 told me that he had made some off comments to her
4 before.

5 Q. Like what?

6 A. I remember she said before that he
7 made a comment that was kind of -- where he was
8 kind of talking down to her because he was an
9 electrical engineer and she was not -- she did not
10 have the title of engineer. So she related a time
11 that she felt like he was kind of belittling her.

12 She told me about -- I can't remember
13 the specifics. I just remember that she told me
14 about a time that he made -- well, she told me
15 about times that he made sexually suggestive
16 comments towards her.

17 Q. Did she tell you what he said?

18 A. She did. I can't remember.

19 Q. Did you ever -- were you present when
20 Mr. Gallagher asked Ms. Acey to go to lunch?

21 A. Not really.

22 Q. Okay.

23 A. I believe there was one day -- there
24 was one day that I remember that I was sitting at

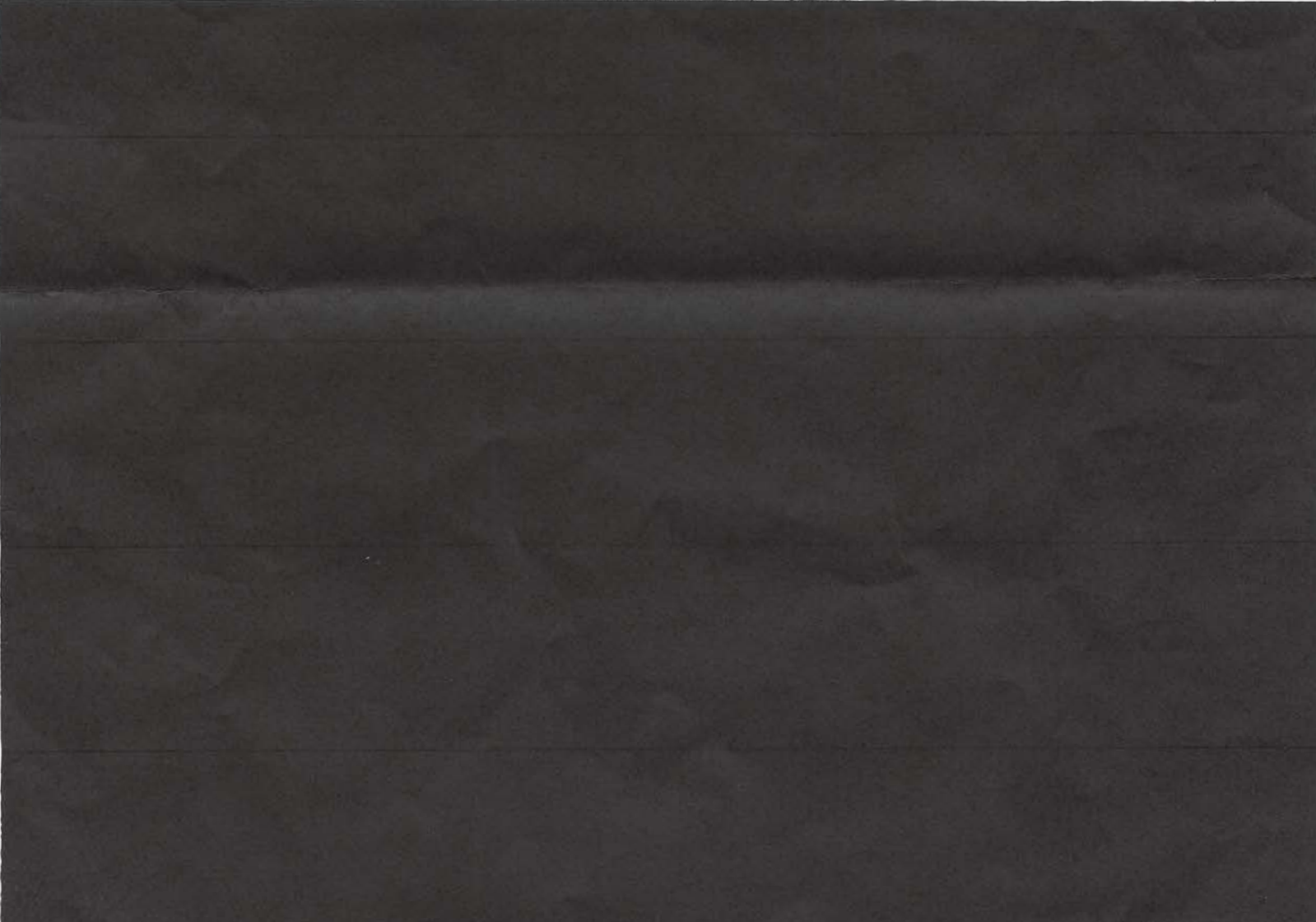
DANIEL HACKMAN

Page 51

1 my desk, and Assata's desk was not too far away,
2 and I noticed that -- that he -- that Sam and a
3 couple others had kind of gathered around her
4 desk. And then she sent me a message shortly
5 thereafter requesting that I accompany her to
6 lunch with those individuals because she
7 doesn't -- she didn't want to be alone with them.

8 Q. Okay. So it sounds like in that
9 specific instance there were multiple people there
10 at the desk; right?

11 A. In that instance, yes.



There is no PTE 42. PTE 42 was purposefully deleted.

**PTE 43 (09/01/2021 Apology Email and
Meeting Screenshot, ECF 15-45).**



Assata Acey <aceyassata@gmail.com>

Fwd: Brian Kenney Teams Interview

Assata Acey <Assata.Acey@momentumdynamics.com>
To: Assata Acey <aceyassata@gmail.com>

5 May 2022 at 15:51

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Assata Acey | Technician
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From: Assata Acey
Sent: Wednesday, September 1, 2021 11:19:18 AM
To: Ryan MacKenzie <Ryan.MacKenzie@momentumdynamics.com>
Cc: Diana Wilmes <diana.wilmes@momentumdynamics.com>
Subject: RE: Brian Kenney Teams Interview

Hi Ryan,
After viewing your email today, I just right clicked my calendar to send an accept and didn't realize you had sent an email Monday(or that it was missed in a group of incoming emails) until it was mentioned to me.
Thank you for your coordination of the meeting, sorry for any issues this may have caused.

From: Ryan MacKenzie <Ryan.MacKenzie@momentumdynamics.com>
Sent: Wednesday, September 1, 2021 9:29 AM
To: Assata Acey <Assata.Acey@momentumdynamics.com>; Seth Wolgemuth <seth.wolgemuth@momentumdynamics.com>; Omar Jackson <omar.jackson@momentumdynamics.com>; Rob Rosenberger <rob.rosenberger@momentumdynamics.com>
Subject: Brian Kenney Teams Interview

Hi Team - Ben asked that I schedule a video call with all of you to speak with Brian Kenney. Please reach out to Ben directly if you cannot attend the interview or accept the invite if you're able to make it. I've attached his resume for reference.

Thanks, folks!

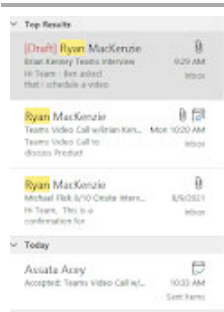
Ryan MacKenzie | Talent Acquisition

Momentum Dynamics Corporation
Fueling the Future of Electric Transportation

3 Pennsylvania Avenue, Malvern, PA 19355
(M) 609.488.0107

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Missed Email.PNG
16K

**PTE 44 (10/05/2021-10/13/2021 Emails
between myself and D. Wilmes (HR)).**

Fwd: Device Payment Agreement and Payoff receipt Inbox



Assata Acey Assata.Acey@momentumdynamics.com [via](#) mtmdy...  Mon, 2 May 2022, 15:31
to me    

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Assata Acey | Technician
484-320-8222 ext 178



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From: Assata Acey <Assata.Acey@momentumdynamics.com>

Sent: Wednesday, October 13, 2021 2:57:45 PM

To: Diana Wilmes <diana.wilmes@momentumdynamics.com>

Cc: Assata Acey <Assata.Acey@momentumdynamics.com>

Subject: Device Payment Agreement and Payoff receipt

I have attached the device Payment agreement which includes the original price of the phone. Because the agreement mentions installments, I think the payoff receipt can also be helpful.

From: Assata Acey <Assata.Acey@momentumdynamics.com>

Sent: Wednesday, October 13, 2021 1:49 PM

To: Diana Wilmes <diana.wilmes@momentumdynamics.com>

Subject: Phone payoff receipt.

As discussed, I did change phone providers and so will need to call the company to get record of the original phone purchase price.

In the meantime, I have attached the payoff receipt which shows most of the phones cost.

I do think it costs significantly less outside of Verizon.

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From: Assata Acey <assataacey@gmail.com>
Sent: Wednesday, October 13, 2021, 1:13 PM
To: Assata Acey
Subject: Fwd: ASSATA, we received your device payment.

EXTERNAL EMAIL

----- Forwarded message -----

From: Verizon Wireless <VZWMail@ecrmemail.verizonwireless.com>
Date: Saturday, September 18, 2021
Subject: ASSATA, we received your device payment.
To: ASSATAACEY@gmail.com

Keep this receipt for your record



Shop **Support** **My Verizon**

Hi, ASSATA | Account number ending in: 1025-00001

Thanks for your device payment.

Payoff date:	09/18/2021
Confirmation:	02537D
Device model:	Samsung Galaxy S9+ 64GB in Lilac Purple
Payment amount:	\$570.00
Payment method:	test35
Account ending in:	9202

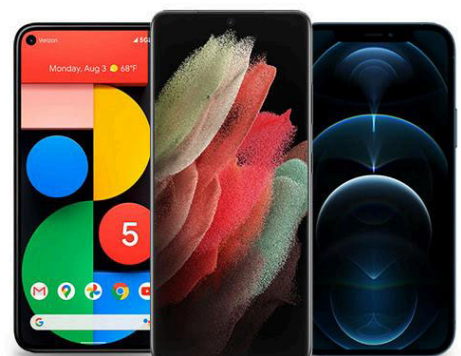
Your payment is being processed, closing out Agreement #1954350220. This payment may not appear immediately, as it will be reflected in the next billing cycle starting on 10/25/2021

Thanks for choosing Verizon.

You're ready for an upgrade.

Check out some of our most popular devices.

[Shop now](#) >





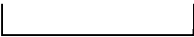
[Phones](#) [Tablets](#) [Accessories](#) [Plans](#) [Verizon Up](#)

This receipt is not evidence of paying off a device until it's been processed in our billing system. You'll no longer be able to make monthly payments for this device and this payment cannot be reversed. If your payment is canceled, rejected or reversed by your credit card company, the full amount will appear on your next month's bill.

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Verizon Wireless, One Verizon Way, Mail Code: 180WVB, Basking Ridge, NJ 07920



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Reply


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Fwd: Phone purchase (with email images) Inbox



Assata Acey Assata.Acey@momentumdynamics.com [via](#) mtmdyn.on...
to me 

 2 May 2022, 15:32



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484-320-8222 ext 178



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From: Assata Acey <Assata.Acey@momentumdynamics.com>

Sent: Wednesday, October 6, 2021 11:27:50 AM

To: Assata Acey <Assata.Acey@momentumdynamics.com>

Cc: Diana Wilmes <diana.wilmes@momentumdynamics.com>

Subject: RE: Phone purchase (with email images)

I went back and downloaded the images that were blocked in the email and resaved as pdf.

From: Assata Acey

Sent: Wednesday, October 6, 2021 10:57 AM

To: Diana Wilmes <diana.wilmes@momentumdynamics.com>

Subject: RE: Phone purchase

Goodmorning Diana,
Please see attached, the digital receipt from the day of the order.

From: Diana Wilmes <diana.wilmes@momentumdynamics.com>

Sent: Tuesday, October 5, 2021 9:48 AM

To: Assata Acey <Assata.Acey@momentumdynamics.com>

Subject: RE: Phone purchase

Thanks Assata, We will definitely need an itemized receipt. But this will give me a starting point for my discussion with Tony on near misses, etc.

Thanks,

Diana Wilmes, [SHRM-CP](#) | Operations & Human Resources Coordinator
Diana.Wilmes@momentumdynamics.com

Momentum Dynamics Corporation

3 Pennsylvania Avenue, Malvern, PA 19355

484.375.9864

484.320.8222 Ext. 130 | [Momentum](#) | [Who We Are](#)

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From: Assata Acey <Assata.Acey@momentumdynamics.com>

Sent: Tuesday, October 5, 2021 9:19 AM

To: Diana Wilmes <diana.wilmes@momentumdynamics.com>

Subject: Phone purchase

Godmorming Diana,

Thank you for your patience with me in misplacing my receipt. I will send image of receipt as soon as I find it.

Attached is:

1. the transaction record with my credit card as well as
2. Screenshot of the replacement item purchased with its pretax price.
3. Shot of the "about-phone" section to confirm it as the replacement item

Hope these help,

Transaction details



\$420.99

Sale



Sep 30, 2021 Transaction date

Oct 1, 2021 Posted date



Target
Malvern, PA 19355
(800) 440-0680

Description	TARGET 00025379
Also known as	Target
Merchant type	Discount stores

Method

In person

Card number

(...7117)

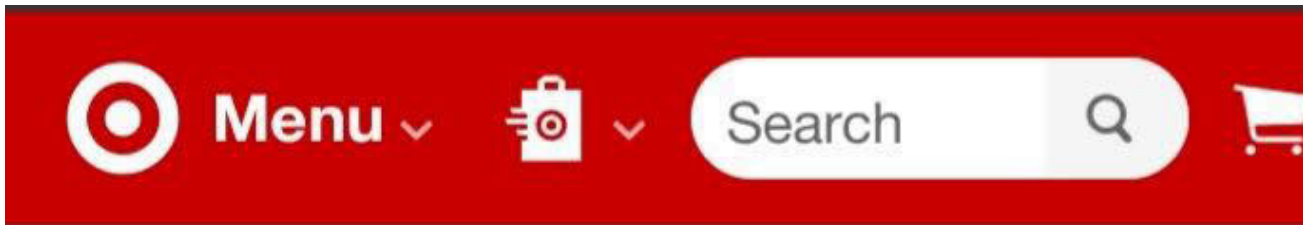
Category

Shopping

Memo

Type here and press enter to save





You're shopping (closes at 10pm):
Philadelphia Bridesburg ▼

Orders ▼ 

[Target](#) / [Electronics](#) / [Cell Phones](#) / [Unlocked Cell Phones](#)

Samsung A42 5G Unlocked (128GB) - Black

[Shop all Samsung](#)





\$399.99



10 ▾

11 Questions



Save 5% every day

With RedCard



Buy Now \$399.99



9:16

93%

< About phone



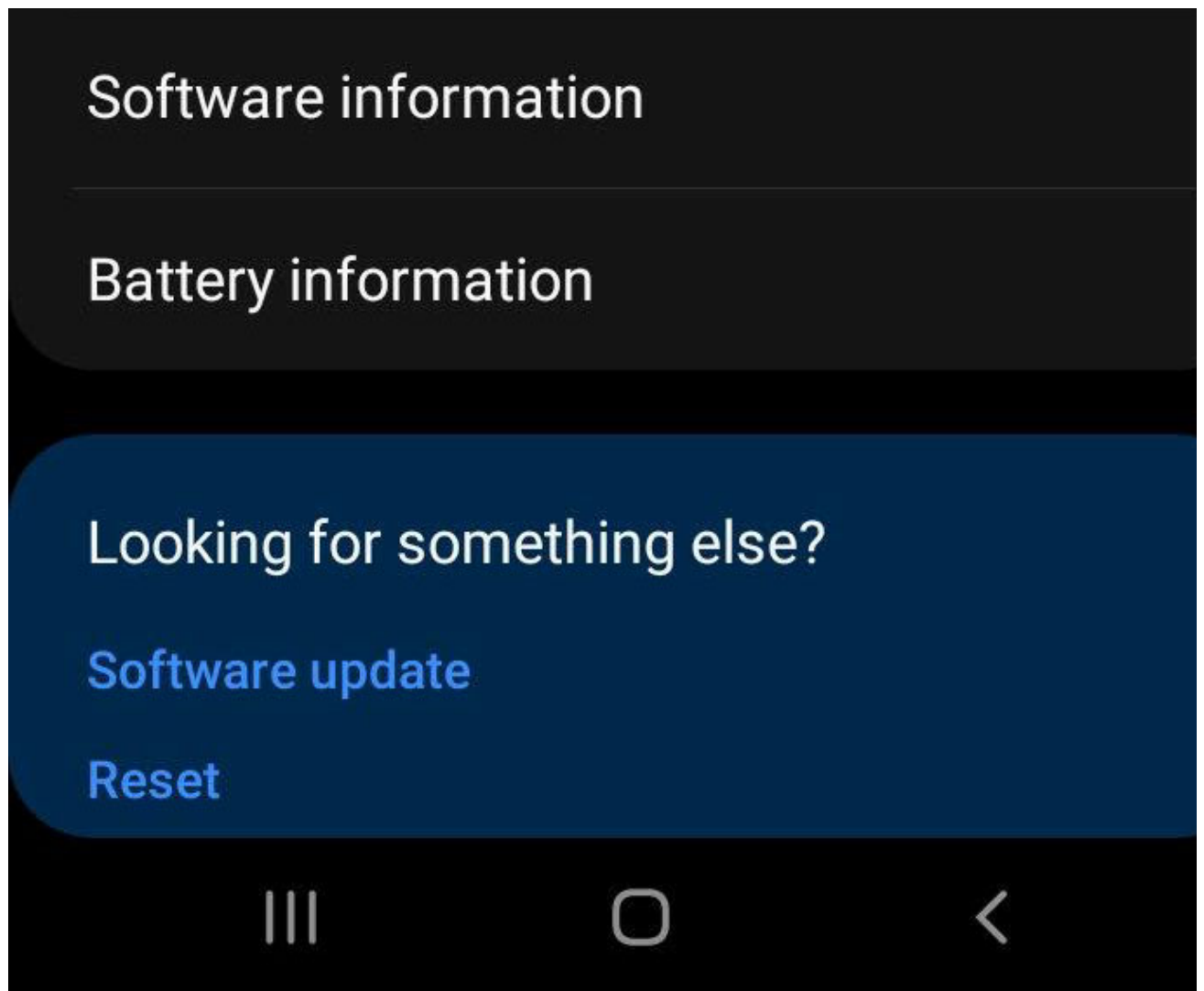
Assata's A42

Edit

Phone number	1-770-231-1017
Model name	Galaxy A42 5G
Model number	SM-A426U1/DS
Serial number	R5CR90HBE1B
IMEI	354049471192038

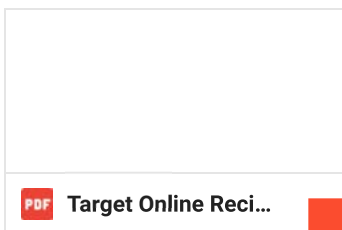
Status information

Legal information



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Reply

Forward



**PTE 45 (04/11/2024 A. Acey Dep. pp. 167(112)-
168(1120), 170(114)-173(1119), 174(113)-
176(1121)).**

2 A. The problem with the cell phone
3 reimbursement was never getting the money for
4 the phone. It was the fact that they made me
5 provide all this documentation in a way that
6 was very embarrassing. It implied that they
7 saw me in a less-than-truthful light.

8 And, then, after I completed all
9 that, told me that I would be the only
10 employee allowed to not have access to a
11 phone with the knowledge that at the time
12 they had made several complaints about me not
13 arriving to meetings on time, and without a
14 phone I can't see the time, so it -- it kind
15 of set me up for more complaints --

16 Q. Well --

17 A. -- and it didn't feel fair.

18 I tried to not get money for the
19 phone. I told Diana several times, "I'll
20 just buy my own phone."

21 I didn't want to give them that,
22 and she just kept insisting and insisting
23 that I prove the phone. She made me go back
24 to Target to get a false receipt just -- a

1 mock receipt because I couldn't find the
2 receipt.

3 Q. You -- oh, but that would -- you
4 don't think Ms. Talis did that to make sure
5 that you did get compensated for the loss of
6 your phone.

7 A. No.

8 Q. No, it wasn't for that.

9 It was because she just wanted to
10 put -- jump -- make you jump through hoops
11 because of your race and gender?

12 A. Absolutely. If she wanted to pay
13 me for the phone, she could have used the
14 receipt from Target that I sent to them.

15 Q. Okay.

16 A. They didn't -- they didn't believe
17 me. They -- they wanted evidence that I even
18 brought or owned the phone that was broken,
19 which makes -- I -- I just don't get why they

4 Q. And were you allowed to use your
5 cell phone in the shop after this incident?

6 A. Right after I confronted Judy about
7 it, yes.

8 Q. So you were allowed to do that,
9 right?

10 A. But for al- -- almost a week, I
11 was -- there's a -- there's, like, a hazing
12 effect, if you consider it.

13 Q. Okay. So for a week you were
14 delayed in being allowed to use your -- a
15 cell phone in the workplace, correct?

16 A. Yes. It was made more difficult
17 for me to comply --

18 Q. Okay.

19 A. -- with the complaints made about
20 me by HR.

21 Q. And you feel that -- you -- you
22 believe that this seven days or a week of not
23 being permitted to have your cell phone on
24 the shop floor was done for the purpose of

1 making it more difficult for you to make
2 complaints to HR?

3 A. (No response.)

4 Q. I want to understand your
5 testimony.

6 I think that's what you just said,
7 isn't it?

8 A. It made me anxious, because I was
9 focused on performing in response to these
10 complaints, and it made it harder for me to
11 comply. It affected me emotionally. But the
12 intent that I viewed was more so that of
13 intimidation.

14 I don't think they were trying to
15 really set me up to give them more
16 complaints. It made me anxious, because of
17 that, but I believe that they did that to
18 harass me for complaining in the first place
19 because, again, when I offered to pay for my
20 own phone as an adult -- as a legal adult I,
21 wasn't allowed to get out of filling out this
22 form.

23 And it was very -- I was
24 embarrassed in the process. It was a

1 non-consensual process for an item that I had
2 already paid for over claims that I had
3 waived, so it didn't make sense.

4 I -- I didn't say, "you owe me this
5 phone because I broke it at work."

6 I let it go, so that I wouldn't
7 have been able to go back and sue them and
8 say, "Oh, you said you would give me this
9 phone," because I told them it was fine. And
10 yet they forced me to go through this
11 process.

12 And, then, there's a context to
13 this. The floor is dangerous. My phone
14 broke because I was asked to move these --
15 these big old boxes that are over, like,
16 80 pounds, and the lift malfunctioned.

17 So, that lift, it -- it fell from
18 at least five feet, made a dent in the
19 cabinet. And I think one of the pictures in,
20 you know, discovery somewhere.

21 But if it had fallen on me, I would
22 have been hurt, and I worked late. So if I'm
23 alone and my phone isn't on the shop floor,
24 my desk is so many paces from that area. How

1 am I going to call somebody for help, like,
2 what am I going to do, what if --

3 Q. Did that happen?

4 A. Did it -- did I get hurt at work?

5 Q. No, no.

6 I mean, you -- you had -- you
7 didn't have a phone for a week, right?

8 A. Did it happen during that week that
9 I needed to call someone and couldn't.

10 Q. Do you think that they
11 intentionally tried to put you in a position
12 on the floor where you didn't have a phone,
13 you might get hurt, and, so, too bad for
14 Ms. Acey.

15 A. It was --

16 Q. Do you think that was the intent?

17 A. No. I think the intent was an
18 attempt to int- -- to intimidate me and the
19 effects were reckless.

3 Q. Well, and -- and they did that
4 based -- because of your race and gender, or
5 is this an OSHA complaint we're talking
6 about?

7 A. No --

8 Q. Okay. So --

9 A. It's not OSHA. They did it because
10 of my race and gender because they felt that
11 it was easier. They thought it was better --
12 they thought it was more okay to treat me
13 like that. They thought it was more okay to
14 treat me because I was black, because I was a
15 woman.

16 Actually, in the -- in some of the
17 notes in the recourse of me talking to Judy,
18 I quoted to Joren that she said that they
19 didn't think I was like that, as to imply
20 that they didn't think that I would be
21 offended, or that I would confront them about
22 that process, and -- and how they handled it.
23 And my impression is --

24 Q. Mm-humm.

1 A. -- that assumption was based off of
2 race and gender.

3 Q. Okay. You mean the process to get
4 the reimbursement that they put you through?

5 A. Oh, the process and the statement
6 that I wouldn't be allowed to have my phone.
7 I mean, Judy sat in the parking lot and
8 cried, and was like, "Oh, we didn't know you
9 were like that."

10 Like, what does that mean, like,
11 why can't you treat people --

12 Q. Tell me about that conversation.

13 A. Sure. Judy is known to avoid
14 written discourse, which I think is shitty,
15 but whatever.

16 Q. Tell me about the conversation in
17 the parking lot that you just --

18 A. I am.

19 Q. Please do.

20 A. And she insisted -- I am -- because
21 I asked her to talk in the email.

22 Q. Mm-humm.

23 A. She refused. And she -- because I
24 sent her the bullet of my understanding, what

1 she was doing and what she said.

2 She said, "It doesn't represent
3 it."

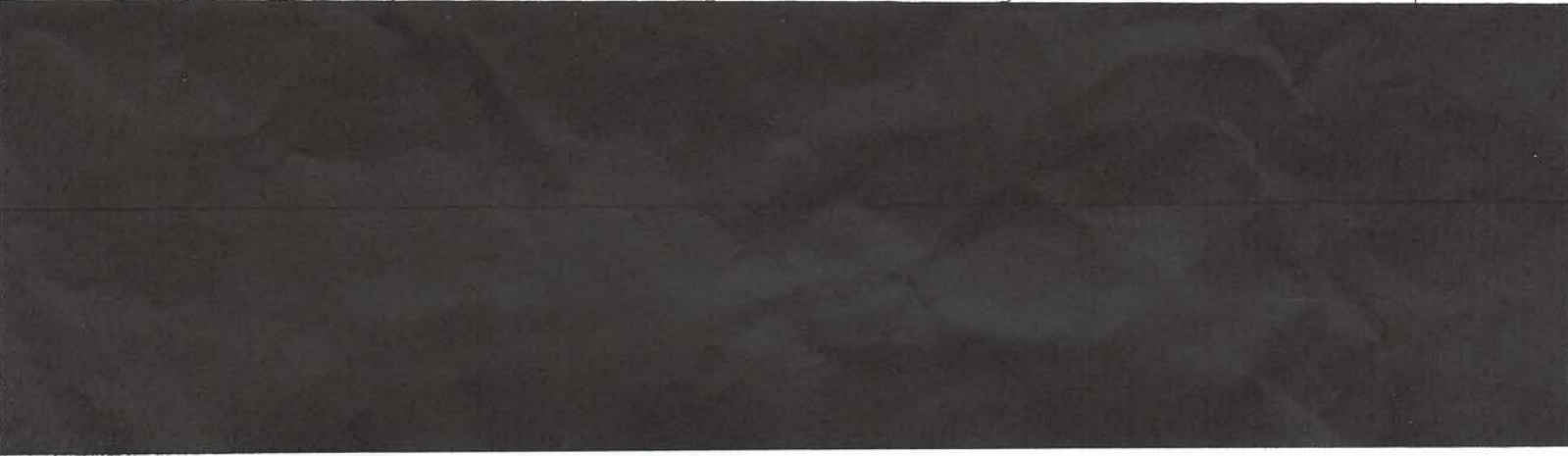
4 I said, "Well, clarify."

5 And she refused to do it on the
6 record. And she met me in the parking lot in
7 front of the company. And when I started
8 taking notes, immediately she raised her
9 voice and asked me to "Please stop."

10 She started crying. I don't even
11 know if she was really crying for real. I
12 just know there was water coming from her
13 face. And she said that she had never said,
14 that Diana twisted her words.

15 And she also said that she didn't
16 know I was, quote/unquote, "like that."

17 I can't remember everything off the
18 top of my head, but as soon as I got back to
19 my computer I told my boss what happened
20 because she was like so vehement against me
21 taking notes during the meeting.



PTE 46 (10/25/2021 Teams Messages between myself and my Supervisor, Doc 40 Transcript (II)(14), *originals filed in Doc 40-2 pp. 415-452*).

14. 10/25/2021 Excited utterance and present sense impression from myself to my supervisor about adverse statements made about the nature of Jackson's work, and about CAOs public and implicit accusations of my stealing time (Ex. 208-225). Supporting Ex: 130-135 References: ECF 8-1 (¶110-111, ¶121((a)-(b)), ¶123).

10:01:04 AM Joren: Assata Acey - 39.5h last week, is that right?

10:33:52 AM Assata: Hi I just saw this and yes

10:34:47 AM Assata: I talked to Judy again. She'd given me the impression before that vacation automatically prepopulates into gaps when it's under 40 hours, and that were only supposed to request vacation in 4hr increment

10:36:17 AM Assata: I didn't want to be dishonest or change it since I couldnt make up that extra 30 min

10:36:43 AM Assata: It's funny though be I thought she was going to tell me i need to stop doing overtime lol *laugh emoji*

10:39:29 AM Assata: I also talked to Julian and noticed he had gathered parts Brian asked for this morning. And was waiting for Brian to come back do he could deliver them(none of us could find Brian for a wee 30 min) It looks like he is getting parts the same day when given part numbers during business hours. I can still go with Brian to request parts from Julian but it's looking more like accuracy and not timing

10:50:43 AM Joren: Nope, OT is fine, if you're doing 2-3h / wk I don't need much, if you exceed that, just please let me know why. Thanks for checking in with Judy on that - appreciate it. Diana came to me about it, and I've currently ignored it, but eh. Is she saying you should put in for 1/2 day PTO to make up for the 30 minutes next time it happens?

10:52:38 AM Joren: Re:Julian - there's some other stuff going on too. I hear you, thank you for that information.

10:53:46 AM Assata: [Direct Reply to message from 10:50:43 AM 10/25/2021-See exhibit X]She's saying if I'm missing 30 mins I should put in 30mins vacation

10:53:55 AM Joren: !?!?!?!?

10:54:18 AM Assata: And implied I could be overloading my overtime by moving time into the next week.

10:54:49 AM Joren: Wait what? Please explain this too.

10:55:06 AM Assata: Be since I'm full time hourly it's illegal for me to get paid less than 40 hours

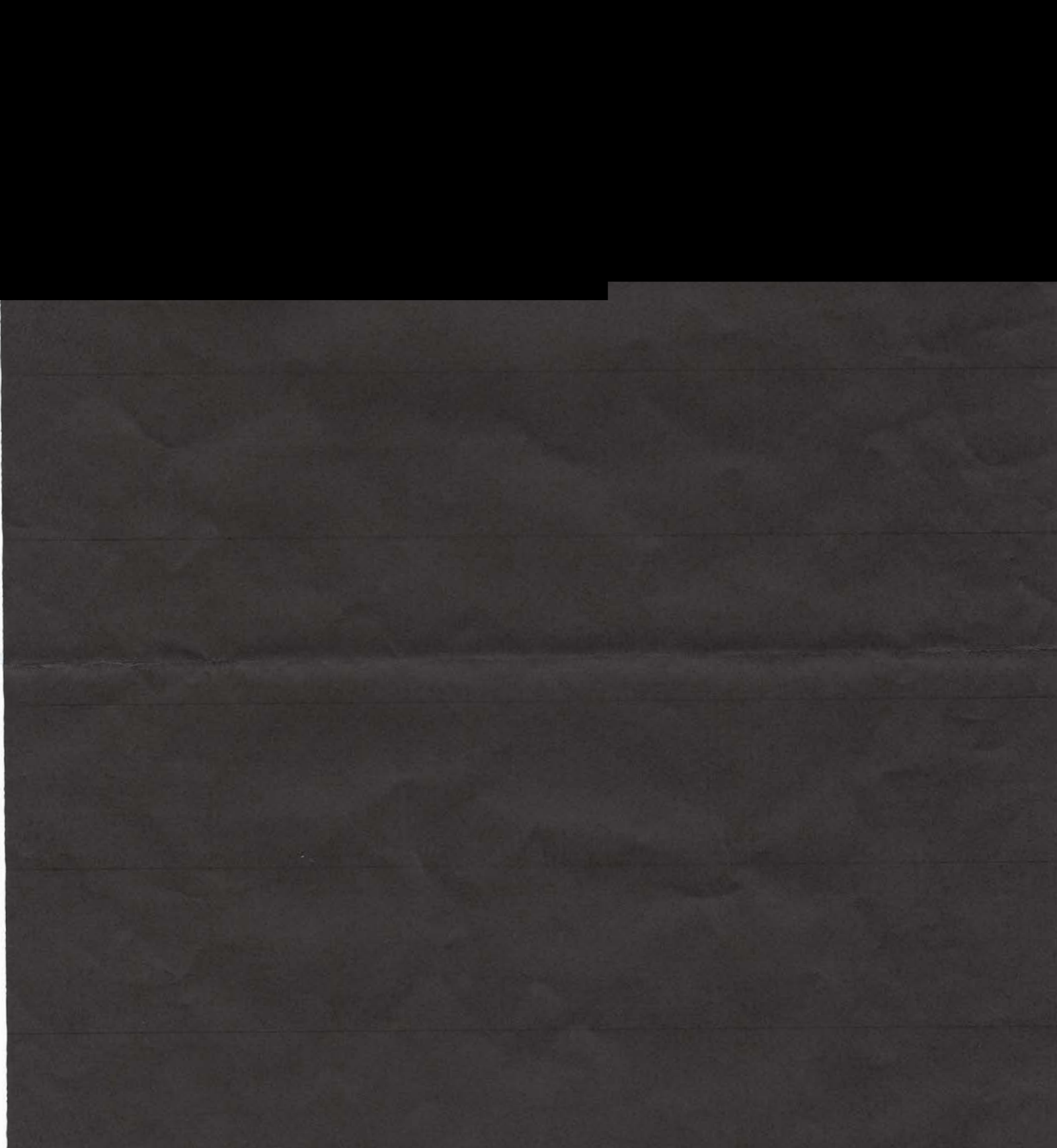
10:55:47 AM Assata: [Direct Reply to message from 10:54:49 AM 10/25/2021-See exhibit X] Like as if I'm leaving 30 mkns off my ti.esheet to add to the next sheet to max out on overtime

10:56:22 AM Assata: Where in reality I leave around the same time whether i leave early or not and try not to do long weeks back to back

10:56:44 AM Joren: [Direct Reply to message from 10:55:47 AM 10/25/2021-See exhibit X] SO

possibly implying time "theft" but that's not what she's saying you should do, and that's not what you are doing, right?

10:58:04 AM Assata: She lightly implied it as If I would be more likely to do so out of ignorance of their system. I think I have enough overtime hours on my own to not need to add 30 mins....



PTE 47 (07/07/2021 Teams Messages between myself and my Supervisor, Doc 40 Transcript (II)(3), *originals filed in Doc 40-2 pp. 1544-1547*).

3. 07/07/2021 Excited utterance, present sense impression and recorded recollection from myself to my supervisor about negative and seemingly derogatory comments from my coworkers (Ex. 764-765). References: 8-1 (¶ 5-6, 10, 105, 121(b)), ECF 15-36, ECF 15-37.

10:24:17 AM Assata: Hi Joren?

I wanted to ask to meet with you but theres not really any private office space. So sorry for these long messages(abt 5 mins reading time)

Purpose : I wanted to check in and realign my sense of what I'm supposed to be doing/ because there's been some behaviors and comments that I have been mixing with me genuinely wanting to make sure I'm helping.

Context: My assessment was that I am supposed to be:

- a) Learning about team processes through shadowing
- b) Completing direct tasks as given by you (ie: cabinet fixes, helping out with boards)
- c) Documenting my work/ supporting documentation so that any related errors found(BOM inconsistencies, wrong use of parts, inaccurate cabinet travelers etc)can be found and reviewed and prevented.
- d) Running supports beyond the scope of direct tasks(ie: working with Seth to document/anticipate moving parts) to you

Request: I know theres definitely a learning curve to where I would be able to become more helpful over time as I learn more. But getting a sense from you with what I should be doing would help me provide the right support and be less confused

Comments and Behaviors:

- a) "I dont build cabinets, that what we have you for. " (when I first met Taylor and was asking what he does) "I dont see why he doesn't just have you build cabinets" (After previewing the chart I was excited to present to him on Friday)
- b) "As an assembler...you" — the beginning of many of Maria's sentences when I ask her about cabinets
- c) Frank: "This is Assata. Shes a technician with a **Physics** degree... she'll be doing better things... Introducing a new hire with a smile.

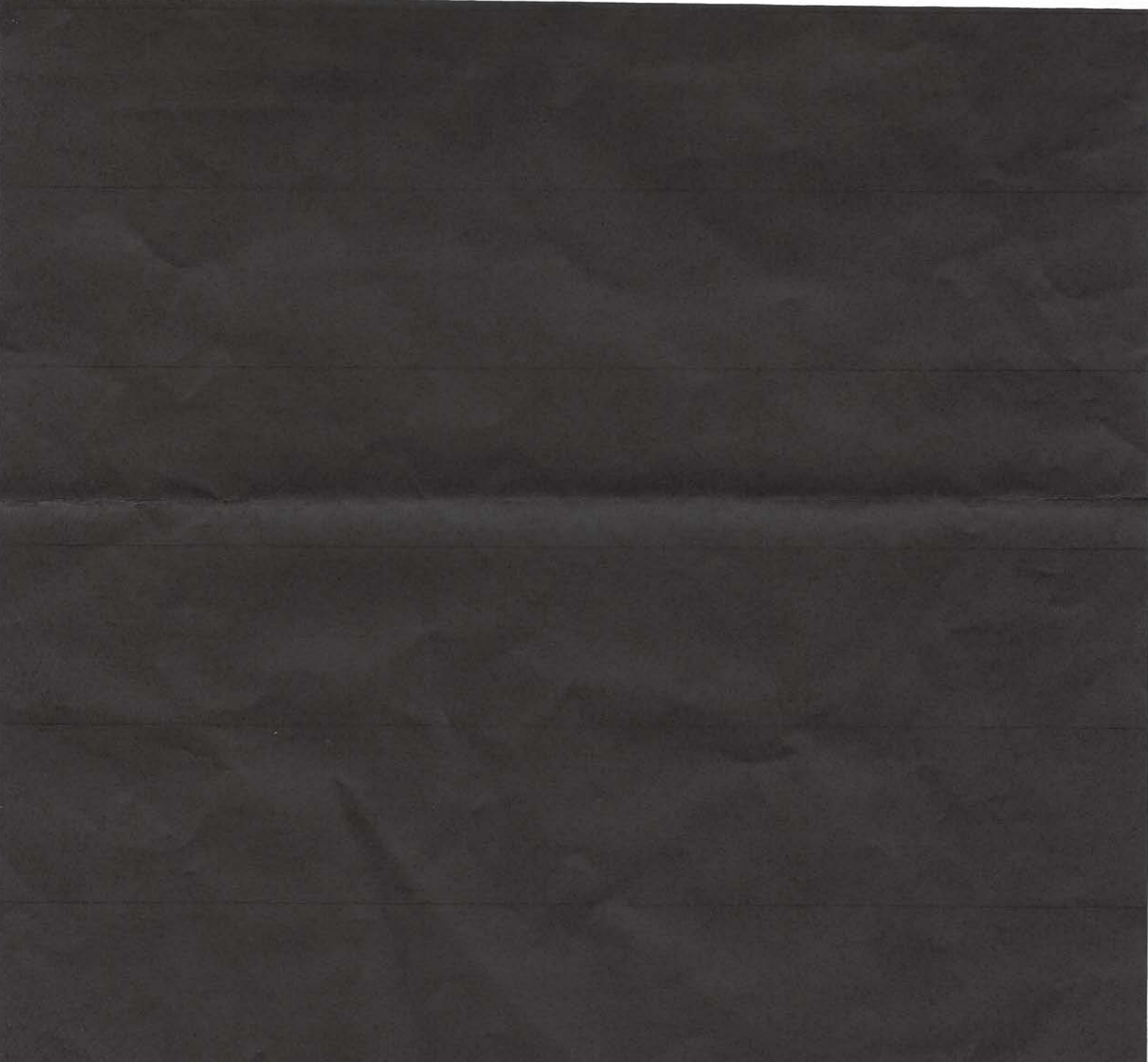
Effects: There are other small actions and experiences but the effect is this **After Taylors comments, I questioned even finishing typing stuff or doing organization, despite i) him being ok with my chart and description on last monday ii) Maria's input about the need for organization

and her intention with those carts **I get a vibe that writing down fixes to be considered for the cabinets, along with documenting feedback or BOM issues is unexpected and not "assembler" role?

Request: I know theres definitely a learning curve to where I would be able to become more helpful over time as I learn more. I know there's also career path stuff, but for here and now getting a sense from you with what I should be doing would help me provide the right support and be less confused. I am also a person and new and I just want to help

11:06:23 AM Joren: Assata,

First off- thank you for being open and letting me know! So sorry for how some of this is coming across. I've sent you an invite for tomorrow to sit down and discuss this - is that acceptable for you?



PTE 48 (07/07/2021 Teams Messages between myself and my Supervisor, ECF 15-36 and 15-37).

rsation with Joren Wendschuh > **Post by Assata Acey Jul 7, 2021**

Case 2:23-cv-01438-GEKP Document 15-36 Filed 05/16/23 Page 1 of 1

7/7/2021 10:24 AM

Hi Joren?

I wanted to ask to meet with you but theres not really any private office space. So sorry for these long messages(abt 5 mins reading time)

Purpose : I wanted to check in and realign my sense of what I'm supposed to be doing/ because there's been some behaviors and comments that I have been mixing with me genuinely wanting to make sure I'm helping.

Context :

My assessment was that I am supposed to be:

- a) Learning about team processes through shadowing
- b) Completing direct tasks as given by you (ie: cabinet fixes, helping out with boards)
- c) Documenting my work/ supporting documentation so that any related errors found(BOM inconsistencies, wrong use of parts, inaccurate cabinet travelers etc)can be found and reviewed and prevented.
- d) Running supports beyond the scope of direct tasks(ie: working with Seth to document/anticipate moving parts) to you

Request: I know theres definitely a learning curve to where I would be able to become more helpful over time as I learn more. But getting a sense from you with what I should be doing would help me provide the right support and be less confused

Comments and Behaviors:

- a) "I dont build cabinets, that what we have you for. " (when I first met Taylor and was asking what he does) "I dont see why he doesn't just have you build cabinets" (After previewing the chart I was excited to present to him on Friday)
- b) "As an assembler...you" -- the beginning of many of Maria's sentences when I ask her about cabinets
- c) Frank: "This is Assata. Shes a technician with a **Physics** degree... she'll be doing better things..."--Introducing a new hire with a smile.

Effects:

There are other small actions and experiences but the effect is this

****After Taylors comments,** I questioned even finishing typing stuff or doing organization, despite i) him being ok with my chart

Conversation with Joren Wendschuh > **Post by Assata Acey Jul 7, 2021** Case 2:23-cv-01438-PD Document 15-37 Filed 05/16/23 Page 1 of 1

Purpose : I wanted to check in and realign my sense of what I'm supposed to be doing/ because there's been some behaviors and comments that I have been mixing with me genuinely wanting to make sure I'm helping.

Context :

My assessment was that I am supposed to be:

- a) Learning about team processes through shadowing
- b) Completing direct tasks as given by you (ie: cabinet fixes, helping out with boards)
- c) Documenting my work/ supporting documentation so that any related errors found(BOM inconsistencies, wrong use of parts, inaccurate cabinet travelers etc)can be found and reviewed and prevented.
- d) Running supports beyond the scope of direct tasks(ie: working with Seth to document/anticipate moving parts) to you

Request: I know theres definitely a learning curve to where I would be able to become more helpful over time as I learn more. But getting a sense from you with what I should be doing would help me provide the right support and be less confused

Comments and Behaviors:

- a) "I dont build cabinets, that what we have you for. " (when I first met Taylor and was asking what he does) "I dont see why he doesn't just have you build cabinets" (After previewing the chart I was excited to present to him on Friday)
- b) "As an assembler...you" -- the beginning of many of Maria's sentences when I ask her about cabinets
- c) Frank: "This is Assata. Shes a technician with a **Physics** degree... she'll be doing better things... "--Introducing a new hire with a smile.

Effects:

There are other small actions and experiences but the effect is this

****After Taylors comments,** I questioned even finishing typing stuff or doing organization, despite i) him being ok with my chart and description on last monday ii) Maria's input about the need for organization and her intention with those carts

****I get a vibe that writing down fixes to be considered for the cabinets, along with documenting feedback or BOM issues is unexpected and not "assembler" role?**

Request: I know theres definitely a learning curve to where I would be able to become more helpful over time as I learn more. I know there's also career path stuff, but for here and now getting a sense from you with what I should be doing would help me provide the right support and be less confused. I am also a person and new and I just want to help



PTE 49 (08/10/2021 Teams Messages between myself and my Supervisor, Doc 40 Transcript (III)(1), *originals filed in Doc 40-2 pp. 703-734*).

1. **08/09/2021 Adverse party statement from my supervisor to me about my assigned supervision of a white male field technician (Chris Schatz) and excited utterance and present sense impression of myself to my supervisor about my white coworkers' (Rob Rosenberg and Taylor Johnson's) opposition to/criticism of same (Ex. 348-363). References: ECF 8-1(5-6, 10-13, 121(b-d), 124-128), Doc 15 (77-78), ECF 15-43, ECF 15-44.**

1:00:35 PM Joren: I'm sorry, I've lost track of his schedule. If he's in, please oversee his work getting the next 150 ready, or assisting you building the 75's / kitting them, alternately, point him at Seth to assist with tub cleanout.

08/10/2021 exhibits 349-363

10:27:05 AM Joren: What do you need to support you and Chris knocking out the 75, and getting any questions answered quickly to progress along with it?

10:28:53 AM Assata: Are you here or available for a team's call?

10:29:30 AM Assata: I think it would be easier to have a short chat

10:30:59 AM Joren: Okay. I'll see about setting up a meeting later today. I'm currently booked all morning.

10:35:33 AM Assata: Valid.. I think everything is on pace to be done one time. I had set daily goals for the august chunk of the priorities you sent(75 and the 150s.)

10:37:12 AM Assata: I am stressed from input from Rob and Taylor and trying to be fair with Chris. I did not expect chris to come right in and start working, but my plan today was to wrap up Quentin repairs and then join him on the 75

10:41:19 AM Assata: I think everything is set up to be done on time and checked. The difficulty for me is not kicking him off of a project I was looking forward to, where it seems folks either want me to be bulding directly or watching him while he builds. Because I want to make the most of the hands we have/an worried about hovering/crowding but am also secure that he won't always be around and I will be able to build additional cabinets

10:41:22 AM Joren: Okay. Please do see if Chris needs anything before wrapping up Quentin. Thank you.

10:43:01 AM Assata: Will do. we check in each morning and throughout the day. It is stressful with folks constantly giving me updates on what hes doing with underlying expectations? Trying to remain concrete

10:44:01 AM Joren: Not sure I follow your last message?

10:46:40 AM Assata: I dont know how to word it in text. But even though I set up steps to get things done in time, I feel like I've been getting carried away wanting to make sure I'm doing stuff correctly. Then Rob or Taylor have been coming to me mentioning "you know chris is doing...or chris is...shouldn't you..." And it gets really confusing as if nothing is in order or on schedule

10:47:18 AM Joren: ok

10:47:19 AM Assata: So I've been trying to ground myself by writing a daily checklist and crossing things out, and also not be weird or controlling towards chris over it.

10:49:44 AM Joren: Ok! Please see if you can get through today and well review later today

10:51:56 AM Assata: Sounds good!



PTE 50 (10/07/2021) Teams Messages

between myself and my Supervisor, Doc 40

Transcript (III)(4), *originals filed in Doc 40-2*

pp. 749-752).

4. 10/07/2021 Present sense impression from myself to my supervisor of Rob Rosenberger's criticism of the nature and scope of my work (Ex 371-372). References: 8-1(¶6-7, ¶10-13, ¶120-121(b-d), ¶124-129), Doc 15 (¶77-80),

8:07:31 AM Assata: today Rob has informed me that I take too many notes, that quality should be taking those notes, that quality is a part of my job,, and then that they need to open a position for that.....

10:01:54 AM Joren: Sorry about Rob. Ugh.

PTE 51 (04/21/2022 Teams Messages between myself and my Supervisor, Doc 40 Transcript (III)(19), *originals filed in Doc 40-2 pp. 1122-1154*).

19. 04/21/2022 Present sense impression and excited utterance from myself to my supervisor about Rosenberg (white coworker) criticizing the PPE I qualified and ordered to my white male team member (technician, Brian Kenny) while refusing to acknowledge me (Ex. 555-570). References: ECF 8-1 (¶4-6, ¶10-13, ¶120-121(b-d), ¶124-129, ¶175-177), Doc 15 (¶77-80).

3:28:16 PM Assata: Lab coats are here

3:28:38 PM Assata: ****unknown attachment****

3:29:14 PM Assata: Rob asked brain what they were and ignored me when I said. As he walked past he expressed that no one's gonna wear them. It's only for a short procedure, so I'm gonna let that go

3:36:09 PM Joren: They arrived today about noon. Julian asked me bout them. Just ignore the old grouch. I placed them on the rack in the back. Maybe we get a hanging rod for them. TBD. A basket for them when used was also placed in the back. Please find a nice spot for that where it's not in the general area and put up a sign to keep trash out that it's only for the company (robins?) clothing to be washed

3:39:33 PM Assata: Clemens*

3:39:51 PM Assata: Did you ever get to follow up with Harry or let it pass?

4:05:13 PM Assata: Robs take on our team "on that team...Omar's the only one who really tries. I have no idea where Seth's at" At this point I wish there were sound barriers between us and test area.

4:05:46 PM Assata: I'm hoping they're gone by the time I finish tubing so that I don't have to ask for the lift back for fans

4:06:26 PM Assata: He's always making comments like that. Face to face during meetings last year abd the one he left this year, and on his own 3 this past month. I think it's worse that he's

saying this regularly to other ppl. It makes any jokes they crack and laugh at after feel booty

4:06:04 PM Joren: Do you want to move the cabinet back to bear Darren?

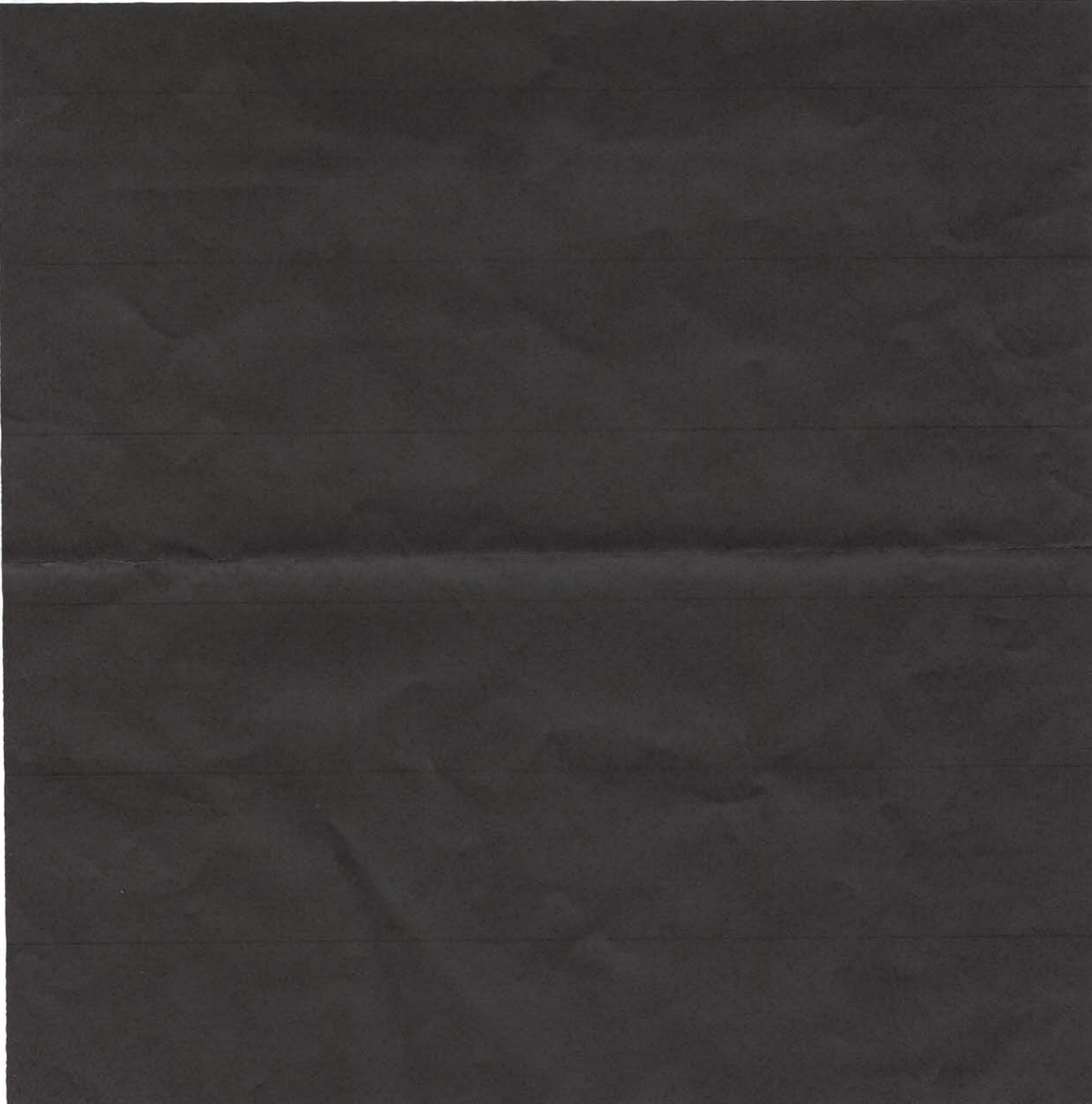
4:07:15 PM Assata: I think so. Darren's nicer

4:07:42 PM Joren: Yup. Ok.

4:07:59 PM Assata: Is this laundry basket?

4:08:27 PM Joren: Thanks for letting me know. I'll have another conversation

4:08:30 PM Joren: Yes



PTE 52 (01/28/2022 Teams Messages between myself and my Supervisor, Doc 40 Transcript (II)(21), *originals filed in Doc 40-2 pp. 515-569*).

21. 01/28/2022 Present sense impression and excited utterance from myself to my supervisor about a white (Brian Kenny) who used me to access the building, held the door open for a white woman, and then allowed the door to slam in my face, leaving me to carry the team's refreshments on my own (Ex. 257-283). References: ECF 8-1(¶39-40(c), 96, 110-111), Doc 15(¶77-78).

8:16:24 AM Assata: Brian w Parked at same time but went upstairs. Dan d is at his desk

8:16:56 AM Joren: haha. Smart guy - he's going for the donuts.

8:20:44 AM Assata: Exactly!

8:23:32 AM Assata: So mi I sprint later

8:23:41 AM Assata: Brian is sipping coffee chatting with Bogdan

8:24:03 AM Joren: Lauren's almost there

8:24:13 AM Assata: I wish he'd try to set up instead of freaking out on the spot but oh well U maybe there's not much setup they can do without representation

8:24:15 AM Joren: Order is for "Dan Dufresne"

8:24:33 AM Joren: Oh, that Brian

8:24:40 AM Assata: How do I convince someone that I'm a white man and to trust with merchandise.

8:25:04 AM Joren: Honda Accord

8:25:05 AM Joren: Front door

8:25:09 AM Assata: *unspecified attachment*

8:25:26 AM Joren: Uh oh! Julian got it? *box of shrunken text*

8:31:48 AM Assata: Let's talk about how our Brian asked me to let him in so I unlocked the building door for him on the way up

8:32:21 AM Assata: But when coffee and donuts came this he held the door and wited outside twice for her to get the coffee in after the donuts

8:32:37 AM Assata: Then this flour basket took off

8:32:50 AM Assata: And I had to carry both coffee things and donuts but myself

8:33:06 AM Assata: And open the door alone

8:33:37 AM Assata: Julian had his own interpretation

8:34:13 AM Assata: Which had to do with the visible spectrum of light □ and how some folks absorb uv from the sun...

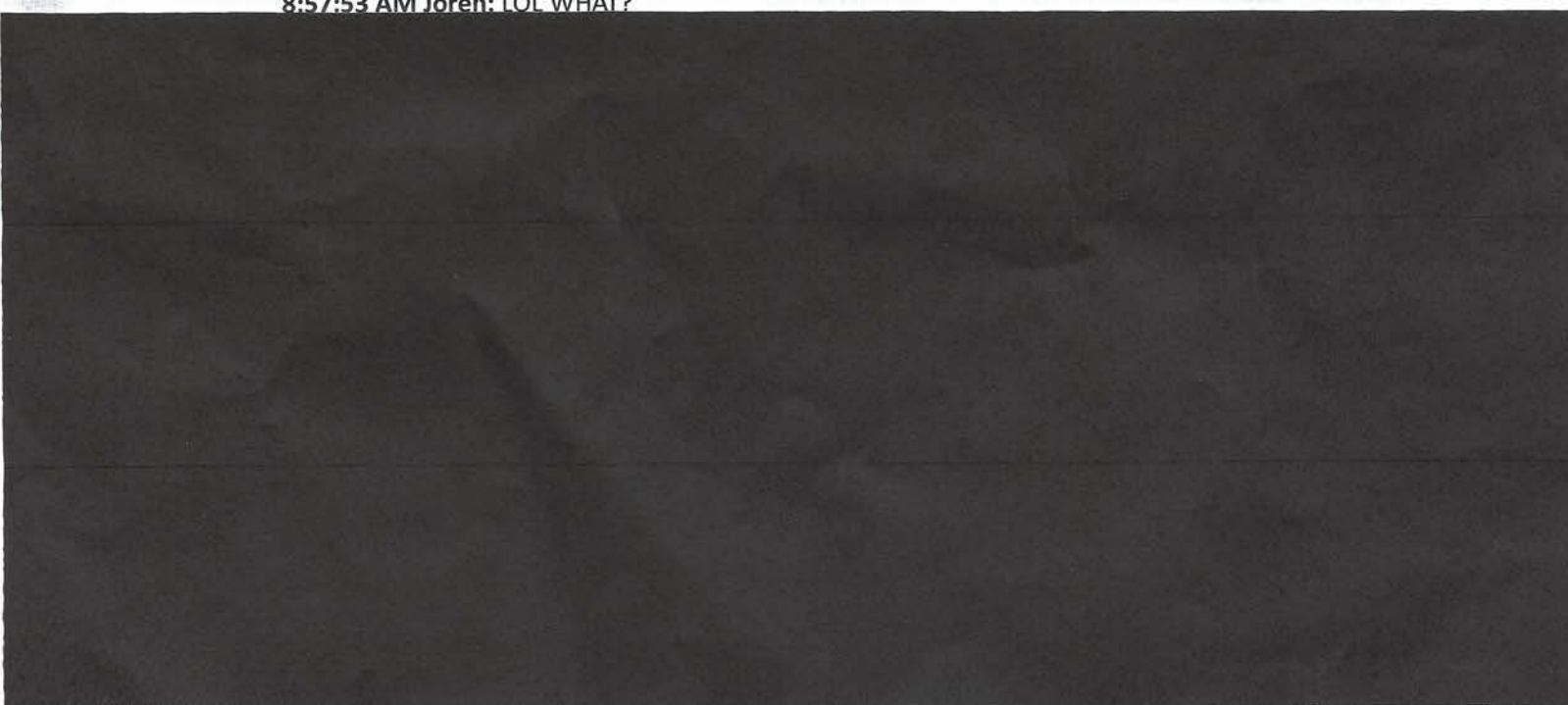
8:34:34 AM Assata: Lol the same.coffee he was gonna drink!! I told everyone he doesn't deserve donuts and gave him a peice of my mins

8:34:48 AM Assata: Given that he doesn't have a key rn, he's likepy outside sulking.

8:47:51 AM Assata: Apparently roasted him too hard he came back with wawa coffee

8:49:49 AM Assata: Idk why I thought Dan d. Would see me with the donuts. Only 2 were taken but he was lighthearted in his mention.

8:57:53 AM Joren: LOL WHAT?



PTE 53 (10/08/2021 Teams Messages between myself and my Supervisor, Doc 40 Transcript (II)(11), *originals filed in Doc 40-2 pp. 1548-1573*).

11. 10/08/2021 Excited utterance of myself and my supervisor and his adverse party statements about coworker's safety accusations made against me in spite of my use of visual and verbal cues (at the time in question) (Ex. 766-778). References: ECF 8-1 (¶5, ¶48-50, ¶110-111), Doc 15 (¶77).

10:24:11 AM Joren: Hey, could you please provide a bit more information on the light tower conversation?

10:25:25 AM Joren: I'm hearing some disturbing things about that, and need to squash this ASAP

10:26:11 AM Joren: This has now become a thing.

11:12:51 AM Assata: Just now seeing this

11:13:02 AM Joren: Oh, ok. Thanks.

11:13:26 AM Joren: Sorry, I thought you had seen this which is why you came over. What did you come over for?

11:14:38 AM Assata: I was just going to tell you how the pneumatic handle went

11:15:23 AM Assata: Thats why I was surprised *surprise emoji*when oh had me sit. Then i was 2orrried Tina had died since I didn't help her with the lift


11:15:51 AM Assata: Then I was just irritated that ppl at work don't use eyes and ears *unhappy emoji*

11:15:57 AM Assata: But I'm chilling now.

11:16:26 AM Assata: Prepping cabinet for lunch time

11:23:13 AM Joren: Thank you.

11:23:23 AM Joren: Sorry about the hydraulic punch



PTE 54 (11/17/2021 Teams Messages between myself and my Supervisor, Doc 40 Transcript (II)(16), *originals filed in Doc 40-2 pp. 453-476*).

16. **11/17/2021 Present sense impression and excited utterance and recorded recollection from myself to my supervisor about the demeanor of two white, new, mechanical team coworkers and my referring to one of them (Tom Hornberger, senior R&D technician through July 2022) as "mustacio guy/mustache man" (Ex. 226-237). References: ECF 8-1 (¶39-40, ¶120), Doc. 15 (¶77).**

11:37:58 AM Assata: Chris seems ok tho

11:38:22 AM Assata: theres too manie chris, mikes, and daniels in this building

11:38:25 AM Joren: Chris who is sitting at my bench?

11:38:26 AM Joren: Yes.

11:39:12 AM Assata: it was so weird. I told them i wa son your team and 1 sentence on what i do and the unfriendly one just smieled at me., like neither person said anything

11:39:41 AM Assata: it was a weird, smug smile....when i came over i asked if they were new and he pintoed out the nicer one as it being theri first day

11:40:44 AM Assata: the weird thing about it all is Id already seen the brunette in kerrys cluster and he would never say hi back or maintain eye contact, so i figured he was aantisoical but....when i went over he was just smirking, anyway theres other things to worry about

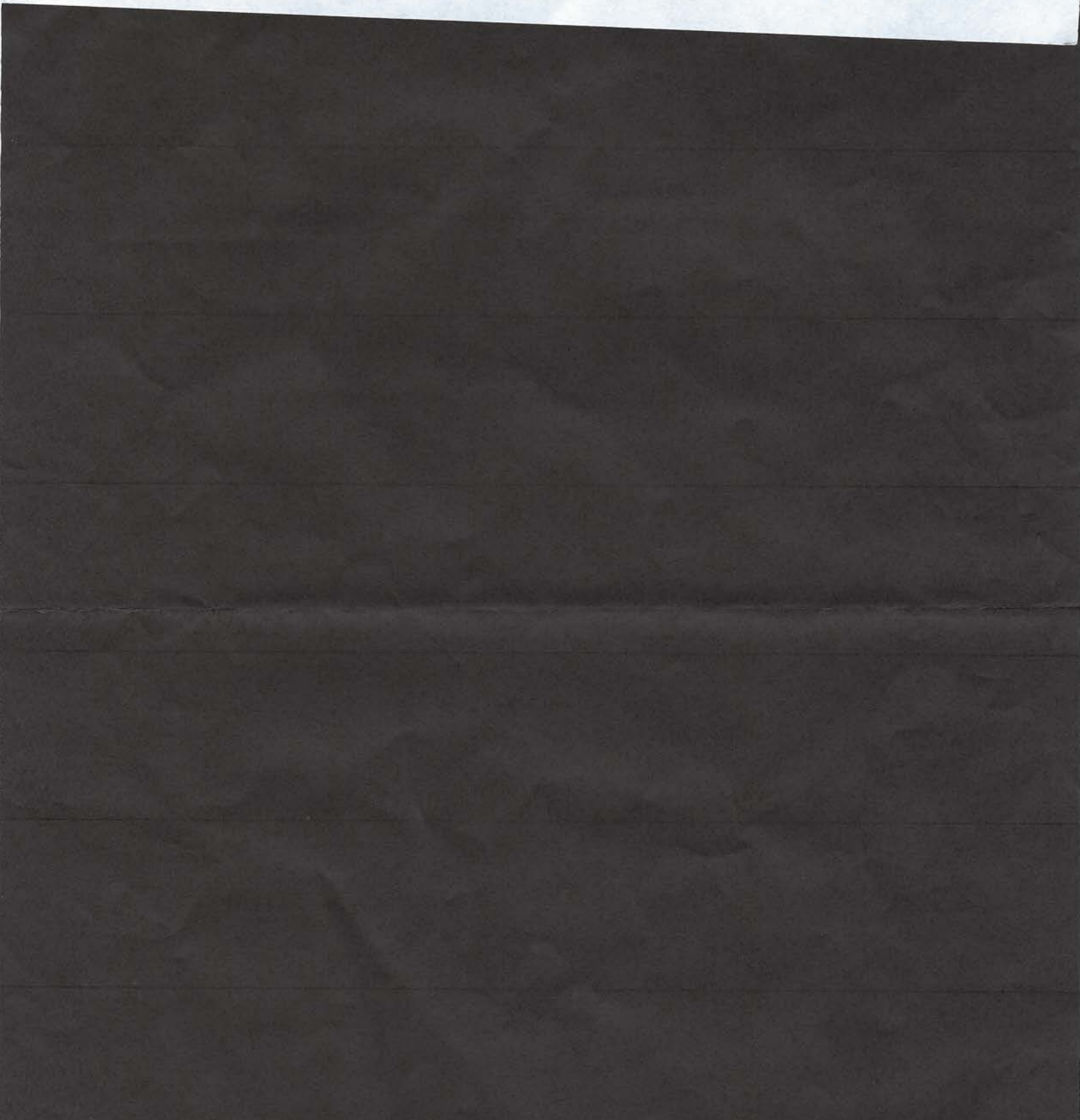
11:41:13 AM Assata: waiting for Maira to finish meetings to get an answer for the AC for VW and the Flow assembly angle

11:41:33 AM Joren: [Direct Reply to message from 11:39:41 AM 11/17/2021-See exhibit X] mustachio guy?

11:41:49 AM Assata: mustacio guy—

11:42:15 AM Joren: Yeah, he's not really personable. Not really keen on him

11:42:29 AM Assata: ive seen him talk when he wants to



PTE 55 (12/13/2021 Teams Messages between myself and my Supervisor, Doc 40 Transcript (II)(17), *originals filed in Doc 40-2 pp. 1620-1631*).

17. 12/13/2021 Excited utterance, present sense impression from myself to my supervisor and his adverse party statement regarding the presence and nature of a cartoon pinned onto my cubicle's outer wall (Ex 802-807). References: ECF 8-1 (¶¶39-41, ¶121(d), ¶¶124-128, ECF 15-34, ECF 15-35, Doc 15(¶¶77-78).

3:10:30 PM Assata: Do you think I should Frame my degree and print my six Sigma/project management certs and frame yhem at my desk?

3:10:58 PM Assata: I think perhaps not but the jok e that's been pinned outside my cubicle feels only specific since no one else has admitted to majoring in physics here

3:12:48 PM Joren: I think you should a **copy** of your degree for sure.

3:12:56 PM Joren: Not sure I follow the second statement there.

5:00:03 PM Joren: Yeah, that's rather odd of a "post".

5:32:17 PM Assata: No one else majored in physics

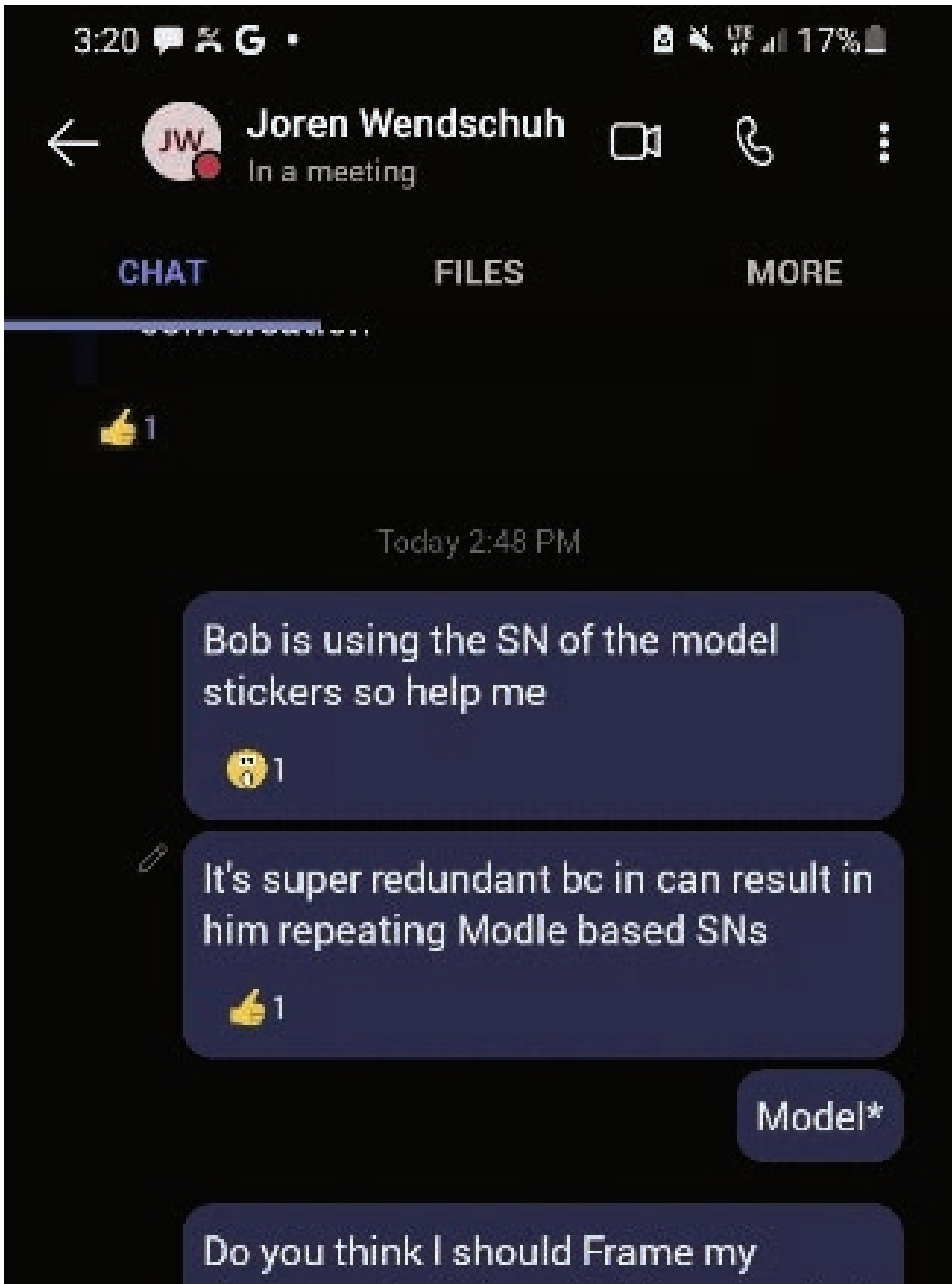
PTE 56 (12/13/2021 Screenshot Teams

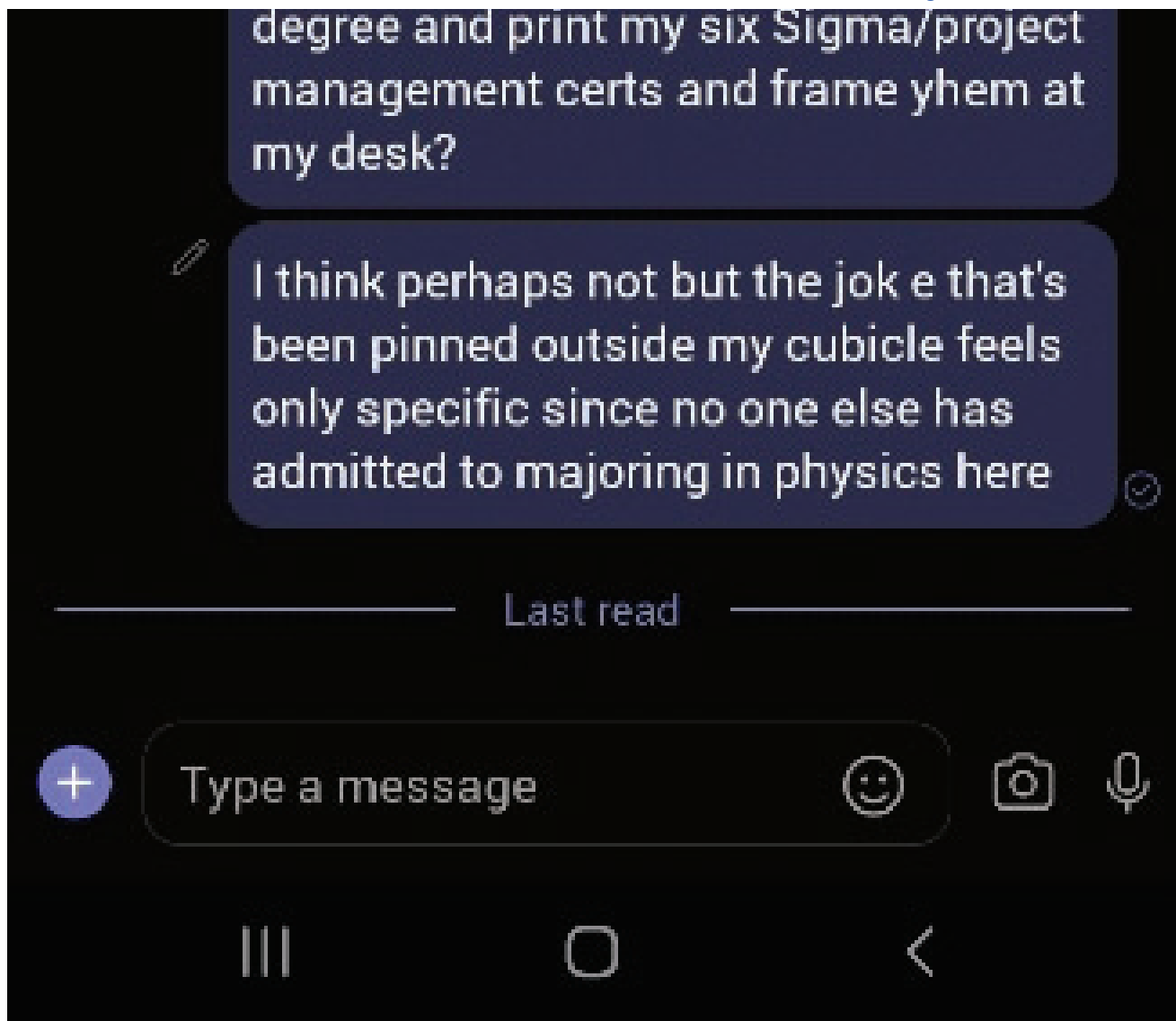
messages between myself and my Supervisor,

ECF 15-34 and 15-35(p.2)).



Soda truth was revealed. Dr Pepper only had a doctorate in theoretical Fizz-ics.





PTE 57(02/18/2022 Teams Messages between myself and my Supervisor, Doc 40 Transcript (II)(32), *originals filed in Doc 40-2 pp. 1604-1619*).

32. 02/18/2022 Present sense impression from my supervisor to me regarding his attempts at addressing a coworker (Jorge Rive) from a separate team who had insisted on my accounting for my work time despite my explicit discomfort (Ex. 794-801). References: ECF 8-1(¶15-6, ¶40(b), ¶121(b), ¶124-128), Doc 15 (¶77-78).

5:01:01 PM Joren: FYI - talked with Jorge about grilling you on where have you been. Let me know if it comes up ever again.

His 'defense' was you were a bit stand offish when asked about how VW was going and that you weren't sure if you could talk with him about it because of past defense contractors you've worked with.

Again, let me know if it ever comes up again.

5:01:30 PM Assata: Not pressing further be he felt slighted

5:02:49 PM Joren: To be clear -1 don't mind you talking about what you're working on with a full time employee of MD.

If it's ever in question, feel free to direct them to me.

To be clear about above - that does not mean I want you to feel obligated to talk about it either.

5:04:25 PM Assata: I see. Defense as far as saying that my discomfort is only due to defense and

not due to feeling unnecessarily scrutinized.

5:04:44 PM Assata: Regardless of his stance, I appreciate you following up for me and letting me know what to do in future

5:05:05 PM Joren: That's why you're hearing about it. I heard you after the Brian thing and I'm trying to be better

5:06:37 PM Joren: It's not a strong suit of mine - I often just "get things done" but like to stay out of the lime light, and saying "hey, I got this done, this is the outcome" feels some like I'm tooting my own horn - not something I like / do well.

Regardless of that - I'm working on following up and back.

5:06:46 PM Joren: Cool!



PTE 57b (02/24/2022 Teams Messages

between myself and my Supervisor, *Doc 40-2*

pp. 691-702).

Exhibit 342- 02-24-2022 Jorge
PM 5-34-49 INDUCTEV
INITDISCL011955.pdf

Message

From: Assata Acey [Assata.Acey@momentumdynamics.com]
Sent: 2/24/2022 5:34:49 PM
To: Joren Wendschuh [joren.wendschuh@momentumdynamics.com]

Jorge was loudly discussing me to someone at the end of day earlier this week. He's since cooled off

**Exhibit 343- 02-24-2022 Jorge
PM 5-34-58 INDUCTEV
INITDISCL011471.pdf**

Message

From: Assata Acey [Assata.Acey@momentumdynamics.com]
Sent: 2/24/2022 5:34:58 PM
To: Joren Wendschuh [joren.wendschuh@momentumdynamics.com]

Thabk you for checking

Exhibit 344- 02-24-2022 Jorge
PM 5-35-39 INDUCTEV
INITDISCL003190.pdf

Message

From: Joren Wendschuh [joren.wendschuh@momentumdynamics.com]
Sent: 2/24/2022 5:35:39 PM
To: Assata Acey [Assata.Acey@momentumdynamics.com]

Sure thing. Ugh. WTF.

Content of loud discussing?

Exhibit 345- 02-24-2022 Jorge
PM 5-35-45 INDUCTEV
INITDISCL009006.pdf

Message

From: Joren Wendschuh [joren.wendschuh@momentumdynamics.com]
Sent: 2/24/2022 5:35:45 PM
To: Assata Acey [Assata.Acey@momentumdynamics.com]

Jorge just left.

Exhibit 346- 02-24-2022 Jorge
PM 5-51-27 INDUCTEV
INITDISCL006707.pdf

Message

From: Assata Acey [Assata.Acey@momentumdynamics.com]
Sent: 2/24/2022 5:51:27 PM
To: Joren Wendschuh [joren.wendschuh@momentumdynamics.com]

Eagle out!

Exhibit 347- 02-24-2022 Jorge
PM 5-51-54 INDUCTEV
INITDISCL012349.pdf

Message

From: Assata Acey [Assata.Acey@momentumdynamics.com]
Sent: 2/24/2022 5:51:54 PM
To: Joren Wendschuh [joren.wendschuh@momentumdynamics.com]

Also, it was something about collaborating with others and why it's important to share information but he was talking to a bug didn't or whoever else would listen to him so I didn't really care

PTE 58 (11/09/2021 Teams Messages between myself and my Supervisor, Doc 40 Transcript (II)(9, 12-13, 15), *originals filed in Doc 40-2 pp. 365-367, 387-414, 1574-1595*).

9. 08/09/2021 Recorded recollection from myself to my supervisor regarding statements made about Julian Jackson (now- laid off black male warehouse associate) by his direct supervisor (Taylor Johnson) (Ex. 183). References: ECF 8-1 (¶110-111, ¶121, ¶123).

9:13:43 AM Assata: I will check with Julian...Taylor has warned me that when getting parts from Julian to not let him order anything but send an email to purchasing so its documented, so I may ask both and let him do his delegation thing?

12. 10/20/2021 Present sense impression and excited utterance/complaint from myself to my supervisor about Julian Jackson's statements to me on Jackson's access to his own work assignments (Ex. 194-199). References: ECF 8-1 (¶110-111, ¶121(b), ¶123).

3:06:54 PM Assata: After double searching the kit for the gasket, I have put in my first parts request. I hope using form doesn't mean things will be slower

4:06:40 PM Assata: Supply chain emails only go to Taylor and Daniel according to Julian

4:06:57 PM Assata: He is certain that they don't go to him and didn't know we were gonna skip him part numbers anymore

Time unproduced PM Joren: It's intentional [*unproduced image*]

5:28:26 PM Assata: Can slow things down, but I'll try to put requests in earlier?

6:23:09 PM Assata: Julian also mentioned that when he is given items from the request form, instead of receiving the form, Taylor reads the numbers aloud to him or send them in a team's message. I don't understand how he is set up for success when there's another level between what is sent in and what he's receiving

6:28:37 PM Assata: Because if I get the wrong part I would look at Julian. But, from this email, they will be trying to match the number I give against their BOM

13. 10/21/2021 Excited utterance/complaint from myself to my supervisor and my supervisor's adverse party statements about Julian Jackson's access to his own work assignments (Ex. 200-207). References: ECF 8-1 (¶110-111, ¶121(b), ¶123).

9:50:48 AM Assata: what I want to say is professionally, if there should be a collated record of whenever Julian gives the wrong thing, he should also have a record of instructions given to him

9:50:58 AM Joren: [Direct Reply to message from 4:06:57 PM 10/20/2021-See exhibit X] He didn't know we were changing things - because we're not "really" - I'm just providing the old

form so that if someone needs it, it's available.

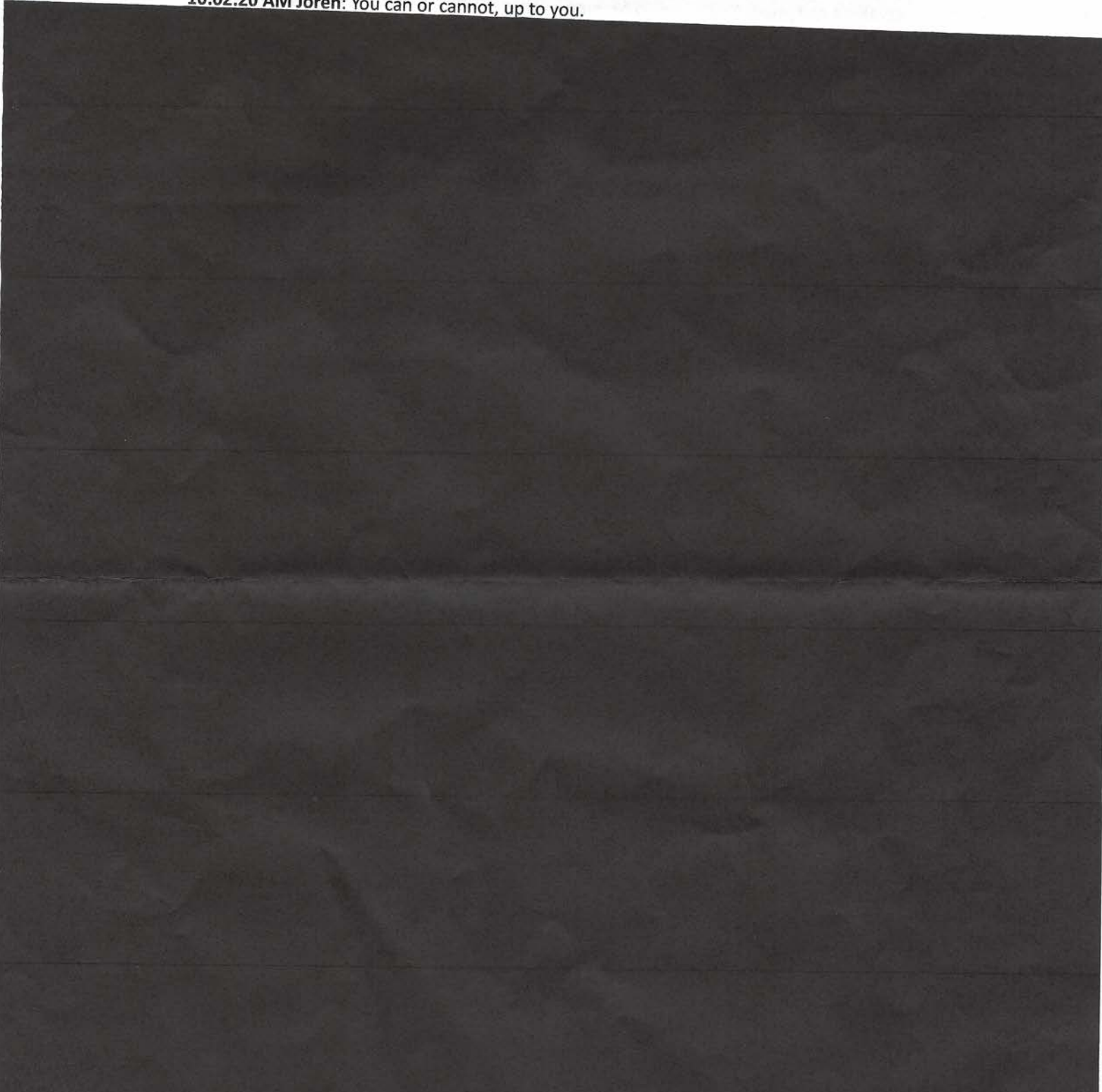
9:51:12 AM Joren: [Direct Reply to message from 9:50:48 AM 10/21/2021-See exhibit X] Agreed.

9:51:33 AM Joren: [Direct Reply to message from 6:23:09 PM 10/20/2021-See exhibit X] Agreed
- it's a strange operating way.

9:51:43 AM Assata: [Direct Reply to message from 9:50:58 AM 10/21/2021-See exhibit X] So im
not supposed to use form to request individual parts

9:51:55 AM Assata: ?

10:02:20 AM Joren: You can or cannot, up to you.



15. 11/09/2021 Present sense impression and excited utterance/complaint from myself to my supervisor about Julian Jackson's statements to me on why his seating was changed and my supervisor's adverse party statements regarding same (Ex. 779-789). References: ECF 8-1 (¶110-111, ¶121(b), ¶123).

3:42:11 PM Assata: Julian said Daniel had him in the front be he thought hed be "more effective/productive" up there. It's giving "assata" talks to much vibes but like directed at him., says hes happy he still works here, grr

3:43:26 PM Assata: Quote of cable shield

3:57:07 PM Joren: <https://www.mcmaster.com/clip-nuts/>

3:58:56 PM Joren: [Direct Reply to message from 3:42:11 PM 11/09/2021-See exhibit X] Hmm strange. A lot of weird going on around that. Not sure why.

3:59:00 PM Assata: [Direct Reply to message from 3:57:07 PM 11/09/2021-See exhibit X] low, floating nut, or enclosed nut?

3:50:18 PM Joren: [Direct Reply to message from 3:43:26 PM 11/09/2021-See exhibit X] Haven't heard anything more, but 1 think Harry's working it. Thanks for finding it!

3:59:40 PM Assata: [Direct Reply to message from 3:58:56 PM 11/09/2021-See exhibit X] its feeling like the flag i raised when the requisition email stuf was coming out.

4:00:08 PM Joren: [Direct Reply to message from 3:59:00 PM 11/09/2021-See exhibit X] not low. Not floating., not snap in.

PM Joren: [Direct Reply to message from 3:59:40 PM 11/09/2021-See exhibit X] Separate things though.

**PTE 59 (04/03/2024 O. Jackson Dep. pp.
72(1116)-73(1114)).**

16 Q. Did you ever witness any employee at
17 InductEV be criticized for being lazy?

18 A. Yeah. Julian -- they was saying he was
19 lazy; he wasn't moving fast enough.

20 Q. So I understand your testimony, you
21 witnessed Julian be criticized as lazy?

22 A. Yes.

23 Q. How did you witness that? Did you hear
24 it?

25 A. Yes, I did.

1 Q. Do you recall who said that?

2 A. Trying to think about who would have
3 said that. I know it was said, though.

4 Q. At the time --

5 A. I don't remember who said it; but I know
6 it was said. I remember it being like, you know,
7 when you hear it, and then you see it. Yeah. It's
8 like, okay, he just takes his time.

9 Q. At the time you heard that, did you
10 think the criticism had anything to do with race?

11 A. No.

12 Q. Did you have any reason to think it had
13 anything to do with race?

14 A. No.



PTE 60 (01/25/2022 Teams Messages between myself and my Supervisor, Doc 40 Transcript (II)(20), *originals filed in Doc 40-2 pp. 507-514*).

20. 01/25/2022 Present sense impression and excited utterance from myself to my supervisor about Tom Hornberger (senior R&D technician through July 2022, aka "mustacio guy/mustache man") passionately calling Julian Jackson (black warehouse associate) lazy (Ex. 253-256). Supporting exhibits (Ex. 226-237). References: ECF 8-1 (¶¶39-40, ¶120, ¶123(b)), Doc. 15 (¶77).

3:49:22 PM Joren: Assembly VA Connector subassembly P-002092-Tool VA HV Connector assembly fixture - do you have a photo of this?

3:49:32 PM Joren: Either way, go save BACON

3:49:37 PM Assata: not folks at wok getting mad about the gaage door and calling Julian lazy behind it. like hes the only one using the door/leaving it open and all uses are just to bring foklift in vs in and out o waiting fo vendors to unload... yikes. of couse it was mustache man.

3:49:43 PM Assata: goign to save bacon!

PTE 61 (09/14/2022 Teams Messages between members of the Electrical Engineering Team, Doc 40-2, pp. 1711-1712).

Exhibit 844- 09-14-2022 Steve
Comments on attendance of
other Black Employees- Omar
Jackson IMG_2112.PNG

09:56



Electrical Team >

10 participants

Chat

Files

Jerry F.



Good morning. Reid is the ER waiting for the o decide if he needs surgery spinal issue. He is in go a bit bored and after a night, very tired, so go him

PTE 62 (09/14/2022 Text Messages between myself and my Supervisor, Doc 40-2 pp. 1715-1718).

Exhibit 846- 09-15-2022 Steve
Comments on Black Employee
Screenshot_20230526_072737
_Messages.jpg

<  Joren(boss) v

What's that printed book?

Sep 15, 2022

Its called

6:58 AM

Does **Omar** take

6:59 AM

lol. Ok. I won't answer.

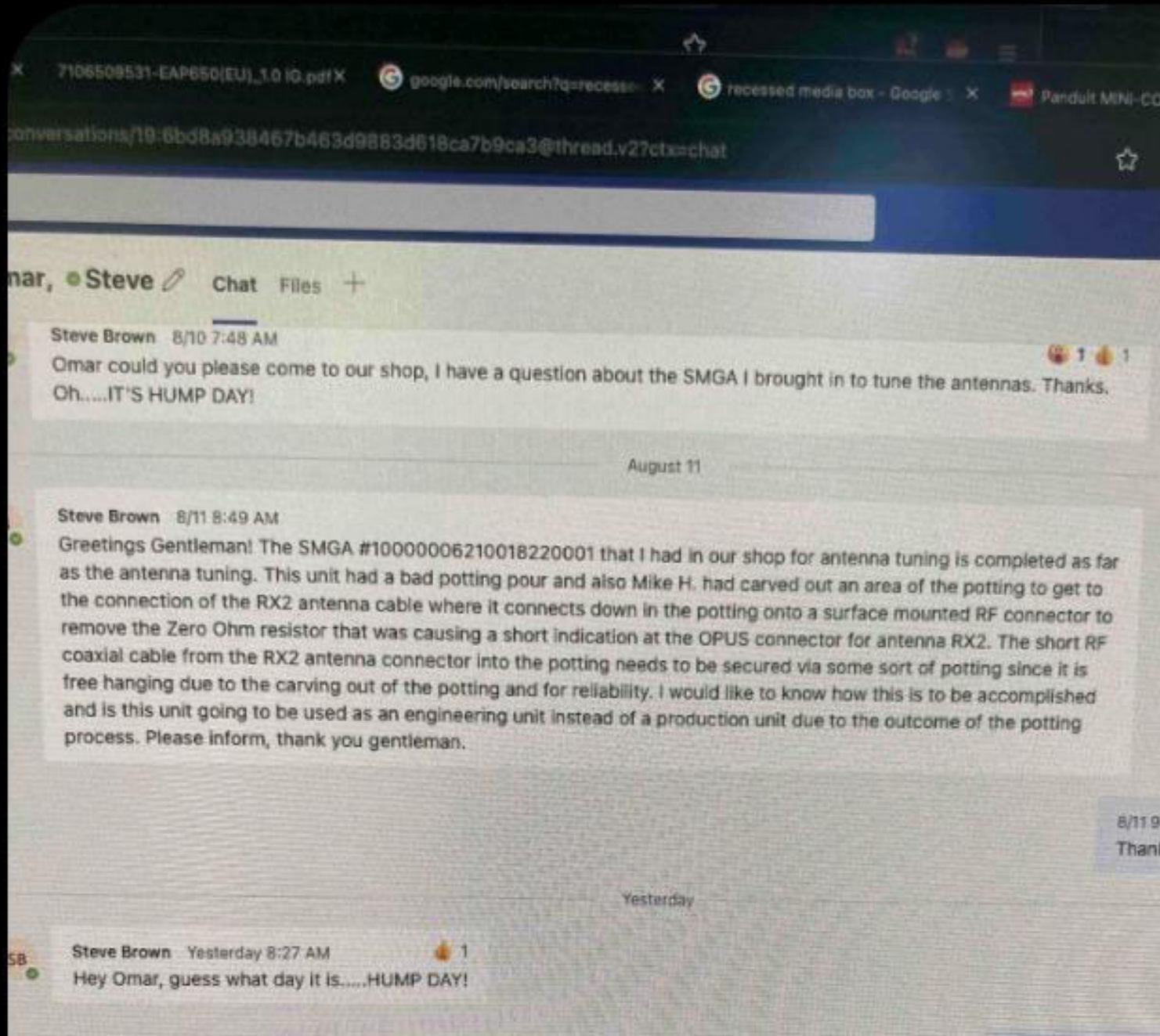
7:40 AM

Exhibit 847- 09-15-2022 Steve
Comments on Black Employee
Screenshot_20230526_072743
_Messages.jpg

7:27



< J Joren(boss) >



**PTE 63 (04/03/2024 O. Jackson Dep. pp.
55(114-12), 66 (1111-16), 99 (1118-24)).**

4 Q. Did you ever talk to Ms. Acey about
5 these interrogatories?

6 A. I can't recall. Is that Steve Brown?
7 Who is Steve Brown? I don't even know him.

8 I can't recall somebody saying I was
9 lazy, in other words being lazy.

10 Q. We're gonna walk through this.

11 A. Okay. I'm sorry. I'm sorry. I went
12 ahead.

18 Q. If you found out that one of your
19 teammates was in the ER, would you respond -- I mean,
20 would you say that they were a slacker?

21 MR. LONGO: Objection. Form.

22 A. No; but knowing Steve, we joked a lot.
23 So Steve -- that's the demeanor, how Steve -- I'm
24 sure Steve was joking there, as well.

25 Q. I want to scroll down. So the next

**PTE 64 (01/04/2022 Text messages between
myself and my Husband p. 1284 (11:45:06)).**

1/4/2022 11:45:06

Assata (+17702311017)

Today I got accused of dating a white man by Omar as an explanation or me being out of touch with how folks are treated at work.

1/4/2022 11:45:32

PTE 65 (04/03/2024 O. Jackson Dep. pp.

93(118)-94(1119), 96(11-97(11).

8 Q. The next paragraph says: At least what
9 I'm seeing, Omar has been with us almost two years
10 now. And with his experience, he would have been
11 brought in as a senior technician, had he not been
12 out of the market for a number of years.

13 Is that what you see on your screen?

14 A. Yes.

15 Q. I just want to hone in on this portion
16 of this email.

17 Do you know what Joren is referring to
18 when he says you were, "out of the market?"

19 A. Yeah. I wasn't in the field. I took
20 myself out when I quit my job.

21 I was tennis coach for four years, three
22 years. I wasn't working in the industry. So when I
23 did get back into the industry, I was working odd
24 jobs. So that was the first or second electronics
25 job I got.

1 Q. So you're saying during this gap, were
2 you unemployed, or were you employed?

3 A. I was you could say both, a little of
4 both. I was employed. Then I was unemployed. Well,
5 I was unemployed for some time, then I found some
6 work. And then it was -- it was odd jobs, like I
7 said. And then I found some work at this place
8 called Faro, F-A-R-O, Technology.

9 Q. Is Faro Technology -- was Faro
10 Technology the employer that you had right before
11 going to InductEV?

12 A. Yes.

13 Q. How long did you work with them?

14 A. A year.

15 Q. Okay. So would you say at the time that
16 you applied to work with InductEV, you had 20 years
17 experience, or more than 20 years experience?

18 A. Yes.

19 MR. LONGO: Objection. Form.

8 When you applied to work with InductEV,
9 did you provide your years of experience?

10 A. Yes.

11 Q. Did you discuss your experience with
12 them? I mean, was there any interview?

13 A. Yes.

14 Q. Did you discuss your experience in the
15 interview?

16 MR. LONGO: Objection to form.

17 A. Yes, I guess I did, if they asked.

18 Q. Have you ever held -- I'm sorry.
19 Prior to -- during your work at CTDI,
20 did you ever receive a supervising role?

21 A. Yes. I was.

22 Q. What was the name of that role?

23 A. That was -- I forget what they called
24 it. It was a manager account. All I know I was --
25 it was -- I was a section head that ran a department.

1 Q. How many people did you supervise?

2 A. Between 15 to 20 people.

3 Q. How long had you held that role?

4 A. Four years.

5 Q. Did you disclose this when you applied?

6 A. Yes.



PTE 66 (09/03/2021 Promotions Email

**Thread between Supervisor, HR exec, CEO,
and VP of engineering, ECF 20-9).**

From: [Judy Talis](#)
To: [Andrew Daga](#)
Cc: [Ben Cohen](#)
Subject: RE: Draft promotion request - feedback appreciated.
Date: Friday, September 3, 2021 3:11:09 PM

Ben,
Andy and I discussed we would like to promote both [REDACTED] and Omar to Senior Technicians. They will get a 15% increase each. This will not impact their annual increase at all.
We can discuss on Tuesday about communicating the promotion.
Thanks,
Judy

Judith Talis | Chief Administrative Officer
Momentum Dynamics Corporation
Fueling the Future of Electric Transportation

3 Pennsylvania Avenue, Malvern, PA 19355
(M) 610.613.1449
www.momentumdynamics.com

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From: Andrew Daga <andrew.daga@momentumdynamics.com>
Sent: Friday, September 3, 2021 10:33 AM
To: Judy Talis <judy.talis@momentumdynamics.com>
Subject: Re: Draft promotion request - feedback appreciated.

I agree on both.

Are you in office today? If not we can get on teams. I have my regular meeting with Tony Suflet at 11 this morning

Andrew W Daga | President and CEO
Momentum Dynamics Corporation
Fueling the Future of Electric Transportation
3 Pennsylvania Avenue, Malvern, PA 19355
(O) 484.320.8222 Extension 121
(M) 610.764.5491

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From: Judy Talis <judy.talis@momentumdynamics.com>

Date: Friday, September 3, 2021 at 9:47 AM

To: Andrew Daga <andrew.daga@momentumdynamics.com>

Subject: FW: Draft promotion request - feedback appreciated.

I agree we should promote [REDACTED] and Omar. We can speak about this when you have a moment.

Thanks,

Judy

Judith Talis | Chief Administrative Officer

Momentum Dynamics Corporation

Fueling the Future of Electric Transportation

3 Pennsylvania Avenue, Malvern, PA 19355

(M) 610.613.1449

www.momentumdynamics.com

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From: Ben Cohen <ben.cohen@momentumdynamics.com>

Sent: Thursday, September 2, 2021 9:16 PM

To: Judy Talis <judy.talis@momentumdynamics.com>

Cc: Joren Wendschuh <joren.wendschuh@momentumdynamics.com>

Subject: Fwd: Draft promotion request - feedback appreciated.

Hi Judy,

I think Joren states this well. I recommend we promote both Omar and [REDACTED].

From: Joren Wendschuh <joren.wendschuh@momentumdynamics.com>

Sent: Thursday, September 2, 2021 7:29 PM

To: Ben Cohen

Subject: Draft promotion request - feedback appreciated.

Ben,

I'm recommending out of cycle promotions for both [REDACTED] and Omar J. based on the conversation with yourself and Judy last week, incrementing their titles to Senior Technicians.

Omar has been with us almost two years now, and with his experience, he would have been brought in as a senior technician, had he not been out of the market for a number of years. He's a valued and motivated team member, able to operate autonomously on projects - and

has come up to speed quickly from his initial hire.

[REDACTED]

Please feel free to ask any questions or follow up, but strongly encourage that we consider promoting both Omar and [REDACTED]. I would like them to be recognized for their strong contributions to this company and their work efforts. Thank you!

Sincerely,

Joren Wendschuh

PTE 67 (04/11/2024 A. Acey Dep. pp.

107(1110)-115(1114).

10 BY MR. SCHAUER:

11 Q. To the best of your recollection,
12 what part of Mr. Jackson's testimony
13 demonstrated to you that, in fact, he did
14 feel that he was discriminated against by
15 InductEV based upon his race?

16 A. In the beginning when he said that
17 he felt, like, he should have been promoted
18 already and he was asking and he didn't feel,
19 like, he was appreciated.

20 Q. And, so, you connect that statement
21 to 'it must have been because of his race'?

22 A. I believe that --

23 Q. I'm asking you if you connect his
24 statement that he should have been promoted

1 sooner to his race.

2 That's a "yes" or no question,
3 please.

4 A. I'm confused.

5 Q. Why?

6 A. Are you asking me whether his
7 statement supports that?

8 Q. I asked you why you made the
9 statement that you felt based on the
10 testimony of Mr. Jackson that he felt he had
11 been discriminated against by InductEV on the
12 basis of his race. And you said, "Yes."

13 A. Okay. So, yes, I connected that
14 statement to race, yes.

15 Q. And it was your conclusion having
16 heard that statement that that was because
17 InductEV discriminated against him based on
18 his race --

19 A. Yes.

20 Q. -- despite Mr. Jackson's testimony
21 that he did not feel that he had been --

22 A. Yes.

23 Q. -- discriminated.

24 In fact, Mr. Jackson said InductEV

1 saved his life, didn't he?

2 A. Yes, he did.

3 Q. Okay. And, obviously, to state the
4 obvious, I mean, your race doesn't change
5 over the employment, right?

6 A. Right.

7 Q. Okay. So -- all right.

8 Is that -- and that's your basis
9 for belief that Mr. Jackson was discriminated
10 against based on that?

11 A. No.

12 Q. Okay. Have you just given me your
13 basis of his experience, and having not been
14 hired in as a senior technician at the very
15 beginning; is that -- is that what you think
16 was the wrong that was done to Mr. Jackson
17 based upon his work experience?

18 A. Not completely, no.

19 Q. Okay. Well, does -- had -- did he
20 ever share with you any information other
21 than that, that, you know, and said, "Hey, I
22 saw that when you first got there," you know,
23 "Here's how I feel about the placements, you
24 know, just be careful."

1 Did he tell you something along
2 that?

3 A. Yes.

4 Q. What did he say?

5 A. Mr. Jackson told me a lot of
6 things, and he always told me to keep my head
7 down. He always talked about racism at work,
8 and he always emp- -- he always emphasized
9 never confronting people about being racist,
10 because he believed, at least as what he told
11 me, that complaining about race in a public
12 way or to people who can control your
13 employment will affect your professional, I
14 guess, opportunities, your ability to make
15 money.

16 Q. Well, that's his opinion, right?

17 A. Yes.

18 Q. And did he say to you that, "Well,
19 and beyond the fact that there might be
20 people here who don't like to be" -- "to have
21 discussions around racism. In fact, I have
22 been discriminated against, and I've been
23 harassed here at InductEV based upon my
24 race"?

1 A. Yes.

2 Q. Well, what is your basis for saying
3 that, other than what -- is there anything in
4 addition to what you just said, his advice to
5 you?

6 A. I mean, there are times when I
7 would have problems.

8 So Omar Jackson treated me like one
9 of his daughters. His daughters are a little
10 bit younger than me. And whenever I had
11 problems at work, he would always ask me how
12 I was, and try to encourage me.

13 When I had problems with HR, he
14 told me that they had done the same thing
15 with him, because he was taking -- like, I
16 guess he wanted to take -- use his vacation
17 to do every other Friday off, and HR was
18 asking various personal questions that he
19 felt they didn't have the -- that they didn't
20 have the right to.

21 Q. So you felt it was inappropriate
22 for HR to inquire into his reasons for
23 wanting every other Friday off?

24 A. I mean, the -- yeah. I mean, those

1 were his vacation days.

2 Q. And what was your vacation issue or
3 your issue with HR around taking time off,
4 that I guess you went to him with a problem?

5 A. No, it wasn't for that. He gave --
6 that was his antidote. I was just asking
7 trouble with HR.

8 But, yeah, he always encouraged me,
9 and he gave examples and he often stated that
10 things were different for people of a
11 different race. But he also -- also
12 vehemently encouraged me to, quote/unquote,
13 keep my head down.

14 Q. Did he give you examples of
15 specific impacts on his terms and conditions
16 of employment at InductEV that he felt were
17 clearly directed to his race?

18 A. Attorney Schauer, during mediation,
19 May Mon Post told me -- I guess to make me
20 feel bad -- that she -- they disclosed the
21 pay of Omar and Seth.

22 And when Omar was a normal
23 technician, he still didn't make what Seth
24 made. And when they were promoted, even in

1 the promotion he was given --

2 Q. Do you all the facts surrounding --

3 THE COURT REPORTER: I can
4 only do two people -- one person at
5 a time.

6 BY MR. SCHAUER:

7 Q. So you -- you're aware of the all
8 facts involving the employment of,
9 compensation of, experience, et cetera,
10 dealings with management of Seth and
11 Mr. Jackson, or not?

12 A. That's what why I asked for it,
13 yes, because I knew that data and I knew that
14 evidence existed.

15 Q. Well, let's talk about you, then,
16 because we've heard from Mr. Jackson, and he
17 didn't seem to share that opinion, except
18 that in the deposition, is that fair, except
19 for, I think, the statement you said he made
20 early on.

21 A. No. He also disclosed the second
22 statement that he told you guys that he
23 recanted, but he also destroyed his
24 credibility in that by stating that he wasn't

1 involved in the interview that precipitated
2 that conversation, which is recorded in
3 discovery.

4 Q. So are we supposed to believe
5 Mr. Jackson or not believe Mr. Jackson?

6 A. I think you should believe the
7 evidence.

8 Q. No. My question isn't the
9 evidence.

10 My question is --

11 A. The answer is no.

12 Q. Okay. So we don't believe
13 Mr. Jackson.

14 I believe at the end of his
15 deposition, you made a statement to the
16 effect that you didn't feel so good or feel
17 so well, why was that?


18 A. Because it broke my heart. I mean,
19 this guy -- in my mind, he was treated
20 unfairly. He was entitled to anything to
21 backpay to the fact that he was denied a
22 designation for no other reason than
23 someone's bias impression of his experience
24 or lack thereof when it was objectively well

1 beyond the scope of the formal requirements.

2 No one ever told him those formal
3 requirements. And it's -- it's fine. It's
4 fine to not promote someone who fits the
5 formal requirements. That's subjective.

6 My problem is that they denied him
7 on the basis of experience. They denied me
8 on the basis of experience.

9 We are black, and they allowed Seth
10 to be promoted, and he deserved it, but he
11 didn't fit the formal requirements, and they
12 were willing to break the formal requirements
13 for a white man, but not for me and not for
14 Omar. And Omar deserved it more.



PTE 68 (09/04/2022 Text messages between myself and my Husband p. 2798).

9/14/2022 10:23:33

Assata (+17702311017)

Its me laughing bc omar takes all his pto whenever he can bc he doesnt trust yall one bit. He is old school black and ive had many chats with him.

Old school black profssiinal is do your job krep your head down try not to get exploited and usr every benefit you get bc youre prkbably jot paid and cant count on being valued

9/14/2022 10:23:56

Duncan and theo have both been sleeping on my bed lately. Then when morning comes, theo is usually downstairs on the couch and duncan is under the bed...I wonder if I kick them in my sleep or something 🤔

9/14/2022 10:24:08

Assata (+17702311017)

He was the first person to tell me stop writing in reasons on my pto request bc folks dont nerd yo kniw what im foing

9/14/2022 10:24:45

Assata (+17702311017)

Lol you might. Or they may like sleeping with you symbolically but want to watch the rest of the house. Their sleep schedukes are different

9/14/2022 10:25:04

Assata (+17702311017)

They listen tonthe earth mire than human routines allow and light is also changibg

9/14/2022 10:25:04

Yeah I can agree with that. For me it's usually just, "I have an appointment" or "I need to tend to some personal matters"

9/14/2022 10:25:26

Assata (+17702311017)

I wastelling judy when i was prepping for thanksgiving food

9/14/2022 10:25:37

Assata (+17702311017)

Pie day plans

9/14/2022 10:25:49

Assata (+17702311017)

Everything had a reason and notr and she was commenting

9/14/2022 10:25:53

That's a bit of an over-share 🤔

9/14/2022 10:26:09

Nah I'm teasing

9/14/2022 10:26:10

Assata (+17702311017)

I was being harassed

**PTE 69 (04/03/2024 O. Jackson Dep. pp. 33
(112-23), 38 (112-15), 40 (111-18)).**

4 A. Oh, no. I had no dispute at work.
5 Honestly, I -- I don't -- I shouldn't get into that
6 part. I shouldn't get into that part.

7 Q. What do you mean?

8 A. The company -- I feel like the company
9 saved my life; you know, because they gave me a job
10 when I was down, when my wife was down. I was
11 depressed at that time at the job. So that's why I
12 had my headphones on. That's why I stayed to myself.

13 That's why I just came and I did my
14 work. So I came five o'clock in the morning, opened
15 the shop up. They trusted me enough to give me the
16 key to open the shop. Everybody had the key, but I
17 turned the alarms and stuff off.

18 You know, that company helped me, so
19 that's how I feel about the company. Whether they
20 was going in a different direction -- I just didn't
21 see my family being able to eat later. That's how I
22 felt, so I had to find a new job.

23 Q. Understood.

2 Q. What is it about what you saw with
3 respect to Ms. Acey's behavior that led you to
4 believe that she was uncomfortable?

5 A. Because she -- I guess the way she sat
6 inside the -- the cabinet one day. And she was just
7 in there, and she wouldn't say anything.

8 I went and ask her how she was doing.
9 She ignore me. She would always say something, but
10 that day she didn't. All I know whether she had
11 problems -- I mean, Joren was the guy that she would
12 talk to.

13 And so like, you know, I try to stay out
14 of things, so I never even asked. And, you know,
15 just didn't ask.

1 Q. Is there anything during your time
2 working at InductEV with Ms. Acey that would have
3 suggested to you that Ms. Acey would have filed a
4 lawsuit against the company?

5 A. I know -- I did hear things like her and
6 Judy didn't -- they weren't on the same page, or -- I
7 did hear things that her and Judy weren't like
8 friends.

9 They went -- like I said, I didn't know
10 why. I didn't know what was going on.

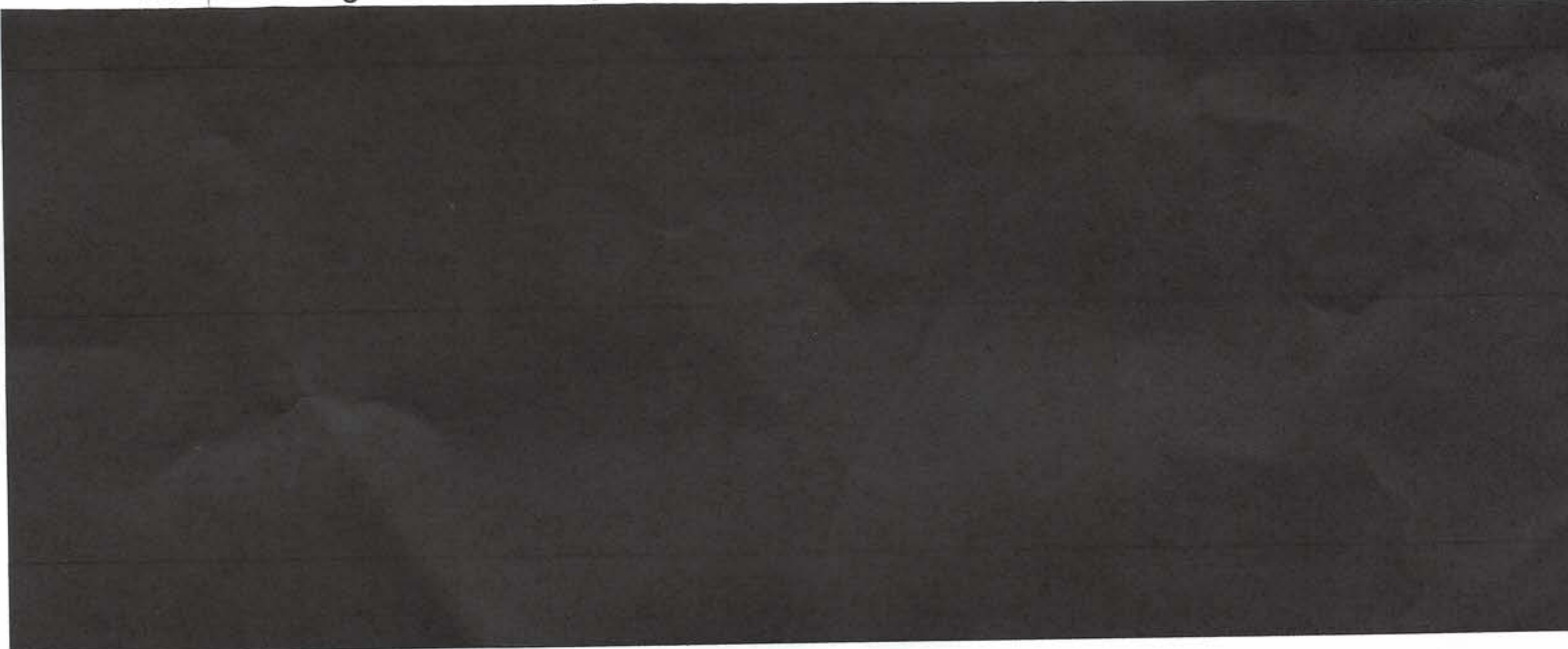
11 Q. Who did you hear that from?

12 A. Just the talk on the floor, the talk on
13 the floor.

14 Q. Do you recall --

15 A. I can't recall. I just know I heard it
16 on the floor. And I was just like, wow.

17 Like I said, I just tried to stay out of
18 things. I really did. No. I can't.



PTE 70 (04/08/2024 M. Tabbut Dep.

pp.25(1121)-27 (117)).

15 I think other things, I had heard
16 racist comments from people in the past which were
17 frustrating to me and I didn't love. Yeah, I
18 think it was, you know, kind of -- they touted a
19 family culture, but it was very much just too
20 personal in a lot of ways, I think.

21 Q. Okay. With respect to the racist
22 comments that you have heard, can you be specific?
23 What comments have you heard -- did you hear?

24 A. Yeah. Yeah, so one that I had
25 heard -- I won't name names, but, yeah, one was we

1 had a vendor come. I think he was, like, a
2 technician or something, black man, and someone
3 said, "You know, I didn't realize we were this far
4 down south," because there was, you know, a black
5 guy working in the office. So that was one
6 comment I had heard.

7 Another one I heard was, "I can
8 call them the "N" word because I've grown up with
9 black people." And I think they said the "N" word
10 a couple times. So that was frustrating. Those
11 are the two biggest examples that I can give you.
12 But, yeah, kind of stuff that I had heard
13 throughout my career there, just two concrete
14 examples that I'll never forget.

15 Q. The first comment you mentioned --

16 A. Uh-hmm.

17 Q. -- the not being this far south;
18 who made that comment?

19 A. Yeah, I'd like not to say. I
20 think just I had felt like I had handled that and
21 told them how I felt about that comment. I called
22 them out immediately on it but, yeah, but, I don't
23 know.

24 Q. Ms. Tabbut, unfortunately, the way
25 the deposition process works is there are very few

1 instances in which you can refuse not to answer a
2 question. So would you please --

3 A. Chris Williams.

4 Q. When Chris Williams made that
5 comment, where was that comment made?

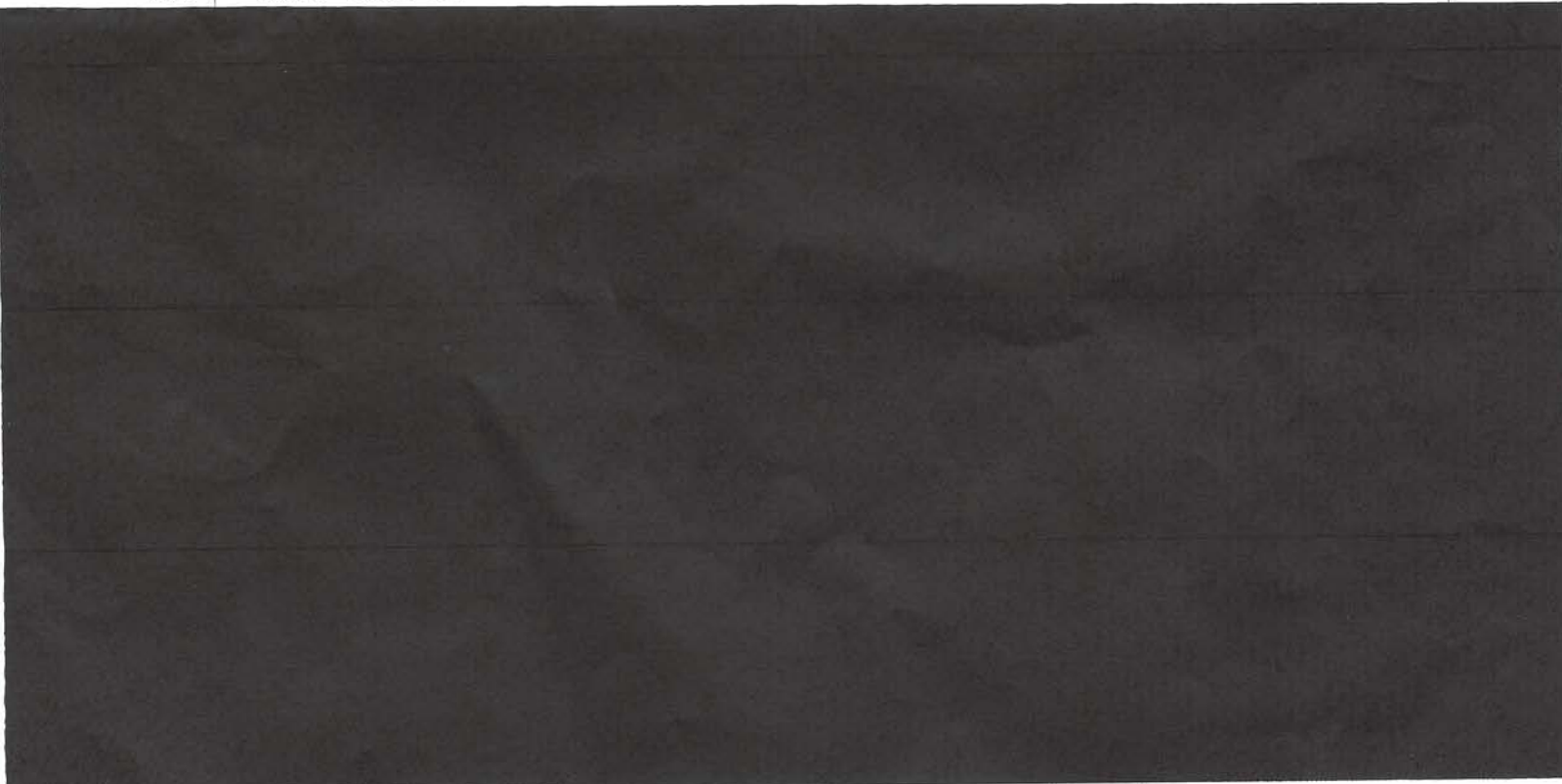
6 A. In the office just, you know, kind
7 of out in the open. He was at a desk that I was
8 close to.

9 Q. And who was he making that comment
10 to?

11 A. I think he was just saying it out
12 loud to a few people that were in the area.

13 Q. Do you remember who else was there
14 in area?

15 A. At this point, I don't, no, but I
16 was there.



PTE 71 (04/08/2024 M. Tabbut Dep.

P27(1117)-35).

17 Q. Do you remember when that comment
18 was made?

19 A. No, it was a few years ago now.
20 It was probably, like, the middle of my time
21 there, so I'd say three or four years ago.

22 Q. Was it before Ms. Acey joined the
23 company?

24 A. Yes.

25 Q. With respect to that comment made

1 by Mr. Williams, as you've testified to, do you
2 know whether -- do you know whether that comment
3 was reported to anybody?

4 A. I did not report it. I will say
5 when I worked there, I was kind of terrified of
6 everything. I didn't think I had confidence when
7 I was a younger or a junior engineer to really
8 call people out on that kind of stuff. I think it
9 took me a while to feel like I could say those
10 things, but I did tell him in person that that is
11 a comment that cannot be said out loud, because
12 that's something I'm not speaking.

13 I do remember him saying that
14 Maria's going -- Maria's the one that keeps me in
15 check, but, you know, I was pretty frustrated by
16 it, like, you can't make a comment and, you know,
17 just it was a frustrating thing to hear. But I
18 had called him out on it, but, no, I did not
19 report it. I don't think I had the confidence yet
20 to kind of do those things.

21 Q. I think you testified earlier that
22 that comment was made because there were -- there
23 was a tech who came into InductEV who, I think you
24 testified, was black?

25 A. Uh-hmm. Correct.

1 Q. Can you describe the circumstance
2 to me? How do you know that the comment he made
3 was directed towards the tech?

4 A. Because he looked right at him and
5 basically, like, it was very -- it was very
6 obvious what that comment was directed towards.
7 He may have even mentioned the vendor of that
8 thing. It was a while ago. I think everyone
9 knew.

10 Q. Can you recall what made it so
11 obvious? In your words.

12 A. Yeah. I think I remember him kind
13 of looking over that way in the direction of the
14 vendor and saying that comment, to which I was
15 pretty shocked by and I -- I don't know. I would
16 say that comment and hearing that and just I
17 immediately knew what he was talking about.

18 Q. Do you think others understood his
19 comment the same way?

20 A. I would assume so, yes. Do I
21 remember that? No, but for me personally, yes.

22 Q. Okay. Do you know whether anyone
23 else spoke to Mr. Williams with respect to that
24 comment?

25 A. No, I was the only one that said

1 something about it.

2 Q. The other comment or, I guess,
3 instance you described earlier was a situation in
4 which the "N" word was used.

5 A. Uh-hmm.

6 Q. Do you remember --

7 A. Yes.

8 Q. -- who made that comment?

9 A. Chris Williams.

10 Q. Can you describe how Mr. Williams
11 made that comment?

12 A. I don't remember the context.
13 Again, it was four or five years ago, before
14 Ms. Acey started working here. I don't remember
15 what we were talking about, but it was something
16 about that Chris had grown up in a black
17 neighborhood and then, for whatever reason, he
18 made that comment, so...

19 Q. When you say for whatever reason,
20 do you not know why he made that comment?

21 A. Yeah, at this point I don't
22 remember, but I do remember the comment, like,
23 that I can never forget, so...

24 Q. I know you said you called out
25 Mr. Williams for the first comment. Did you do

1 the same for the second comment?

2 A. That one I didn't. That had
3 happened earlier. I think, again, I was kind of
4 too stunned to even say anything. I, yeah, I
5 think I just kind of was, like, quiet and then
6 left after that.

7 Q. The comment with Mr. Williams
8 saying the "N" word, that occurred before the
9 comment about being down south?

10 A. Yeah, yeah, that occurred before
11 the other one.

12 Q. So both predated Ms. Acey's
13 employment?

14 A. That's correct, yeah.

15 Q. Were there any managers present
16 for either of these two comments?

17 A. I don't believe so, no.

18 Q. Do you know whether the second
19 comment was reported?

20 A. No, I don't think either of them
21 were. If anyone were to report it, it probably
22 would have been me, and I didn't do that, so...

23 Q. Why didn't you report it?

24 A. Again, early on in my career, I
25 think my confidence level was pretty low. There

1 were a lot of things that took me a while to, you
2 know, speak up on later in my career.

3 Q. Okay. Were there any other
4 comments predating Ms. Acey's employment that you
5 can think of?

6 A. Those are the main ones that I can
7 think of, just from, you know, my career there
8 that were, I would say, extremely racist. But,
9 yeah, I know there was always a lot of political
10 talk, those kinds of things, that were touted by
11 people or, you know, just spoken about that I
12 don't think anyone would appreciate, you know,
13 stuff like that, too, so...

14 Q. With respect to the comments we've
15 discussed, when you say those are the main ones,
16 are there other comments you can think of that
17 predated Ms. Acey's employment?

18 A. No concrete examples that I can
19 give you, I will say that, but I -- that had
20 always kind of been the culture of people just
21 said whatever they wanted and typically,
22 unprofessional, is how I would say a lot of my
23 career at Momentum would be with certain
24 employees. And, yeah, again, I can't give a
25 concrete answer but, or, you know, a concrete

1 example other than the two I gave you, but it
2 happened a lot before and during Ms. Acey's
3 employment.

4 Q. And I'm understanding you're
5 saying that you can't give concrete examples
6 beyond the two, but you're saying it happened a
7 lot. What happened a lot?

8 A. Just did -- the way that people
9 would make unprofessional statements or comments
10 day to day in the employment term that I think
11 left me uncomfortable sometimes and feeling like I
12 couldn't work there and want to be there, so...

13 Q. Right. And my question deals with
14 the specifics of those statements, so can we walk
15 through those statements?

16 A. Sure.

17 Q. So other than the two statements
18 that you have testified to earlier, what other
19 remarks, comments, statements did you hear during
20 your time at InductEV?

21 A. Sorry. Give me one second.

22 Q. Take your time.

23 MR. LONGO: Madam court reporter,
24 note that the witness has turned her camera off,
25 please.

1 MS. ASSATA: Mr. Longo, I would
2 like to request after the question that we take a
3 10-minute break or so, if that's okay with you.

4 MR. LONGO: I would like to go
5 until at least 11.

6 THE WITNESS: I understand.

7 MS. ASSATA: I understand that. I
8 just -- if the witness appears emotionally
9 disturbed after the question, I'd like to offer
10 them a break. I'm not sure it would be helpful to
11 have them transcribed while they're crying.

12 MR. LONGO: Why don't we take --

13 THE WITNESS: I can finish your
14 question, if that's what you need but, yeah, maybe
15 a break or two would be...sorry, it -- yeah,
16 sorry. Seven years at InductEV was a lot, so I'm
17 just kind of reliving some stuff so, sorry.

18 BY MR. LONGO:

19 Q. That's okay. We will get through
20 the question and we'll take a short break; okay?

21 A. Yeah, sure.

22 Q. So other than the two comments
23 that you testified to earlier, help me understand
24 other comments, remarks, things that you heard
25 during your time at InductEV, starting from the

1 beginning.

2 A. Yeah, I mean, another example that
3 I can remember, at least politically, was when
4 COVID was happening and coworker, Rob Rosenberger,
5 was frustrated and talking about that it was
6 China's fault because of COVID and he was running
7 around the office just kind of saying that it was
8 China's fault, kind of going into that. I do
9 remember that comment as well.

10 That was not reported, but it's
11 something I started to argue with him about and
12 just decided I need to walk away, because, you
13 know, there's -- political conversations are not
14 something I want to get into at work and fight
15 about, so I stepped away from that, but that was
16 another example. Yeah, those, I would say, are
17 the biggest examples I can think of right now that
18 have kind of, you know, remained in my head of
19 things. But, yeah, like I said, I'm sure there's
20 probably more and, if I think of them, I'll let
21 you know.

22 MR. LONGO: Let's take a 10-minute
23 break and meet back here at 11:00.

24 MS. ASSATA: Sounds good.

25 MR. LONGO: Thank you.

PTE 72 (02/14/2022 CAO email commenting on my complaints, Doc 73-3, p. 11; Various dates, HR Training Emails, Doc 73-3 pp. 43-51).

5/13/23, 3:25 PM

Case 2:23-cv-01438-PD Document 73-3 Filed 03/31/24 Page 11 of 58



Assata Acey <aceyassata@gmail.com>

Fwd: Per our Discussion

Assata Acey <Assata.Acey@momentumdynamics.com>
 To: Assata Acey <aceyassata@gmail.com>

29 April 2022 at 10:37

Assata Acey | Technician
 484-320-8222 ext 178



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From: Judy Talis <judy.talis@momentumdynamics.com>
Sent: Monday, February 14, 2022, 10:45 AM
To: Assata Acey <Assata.Acey@momentumdynamics.com>
Subject: Per our Discussion

Assata:

Thanks again for spending time with me last week to share your concerns. In follow-up, you raised a general concern surrounding behavior that you believe constitutes unconscious bias. During our meetings, I asked if there were specific individuals or incidents about which you were making a complaint and/or needed to be addressed and you responded no, but added that there were interactions that you have had with other employees that you believe might be useful to incorporate into future company training.

In response, I would like to invite you to send me some brief notes concerning these examples and I will certainly review them for inclusion into our upcoming workplace training. You may send those to me at your convenience and I will let you know if I have any questions or need additional discussion with you.

Thank you for sharing your thoughts and input. Additionally, if you at any time believe that there are matters which you believe violate our policies against harassment or discrimination, please let me know immediately.

Regards,
 Judy

Judith Talis | Chief Administrative Officer
 Momentum Dynamics Corporation
Fueling the Future of Electric Transportation

Exhibit 17- 2022- Talis Announces Company
Wide Diversity Training for September While I
am Still Employed

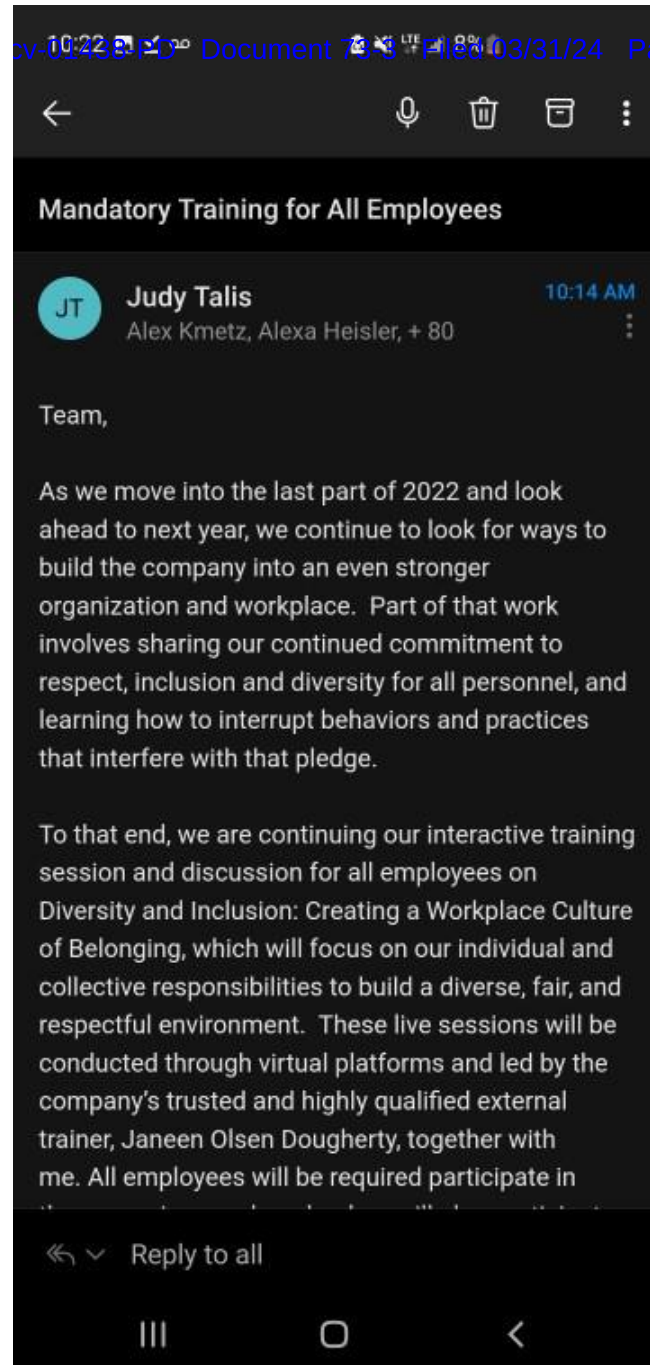


Exhibit 18- 2022- Talis Announces Company
Wide Diversity Training for September
While I am Still Employed

10:23

LTE 8%



to that end, we are continuing our interactive training session and discussion for all employees on Diversity and Inclusion: Creating a Workplace Culture of Belonging, which will focus on our individual and collective responsibilities to build a diverse, fair, and respectful environment. These live sessions will be conducted through virtual platforms and led by the company's trusted and highly qualified external trainer, Janeen Olsen Dougherty, together with me. All employees will be required participate in these sessions and our leaders will also participate in an additional program focusing on their added responsibilities.

Each of you will receive information about the timing and logistics of your session and all employees will be required to attend their designated session in order to allow the company to complete this critical priority before year-end. We recognize the many competing priorities and time pressures that we all face, and you may need to move other meetings to accommodate these sessions. We thank you in advance for your continued shared stewardship of our workplace and the individual employees and perspectives that contribute to its success.

You will receive a Teams Meeting Invite. If you cannot attend on your designated time slot and were unable

⏮️ ∨ Reply to all



Exhibit 19- 2022 Talis Announces Company
Wide Diversity Training for September
While I am Still Employed

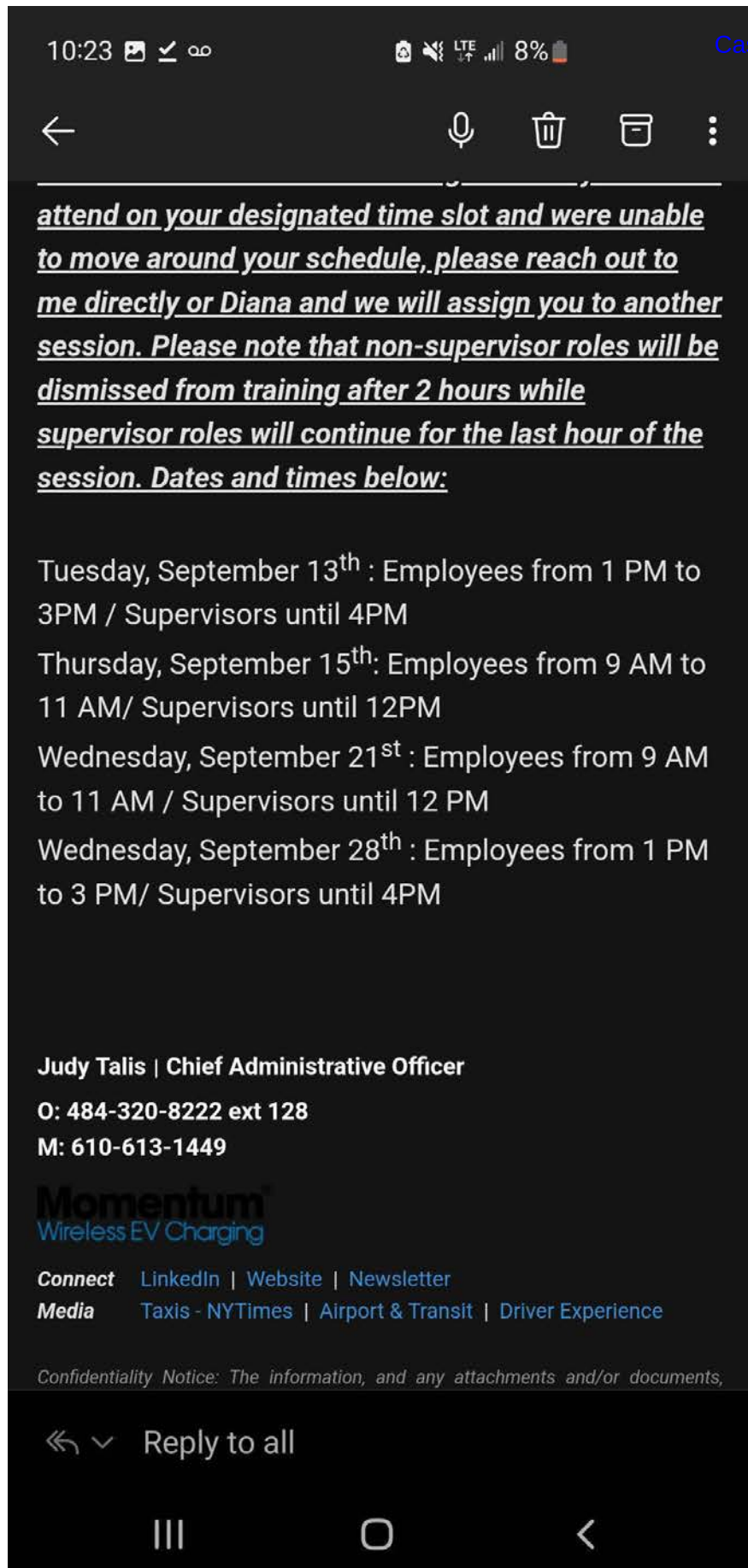


Exhibit 20- 2022 Wilmes Announces New Dates
for Diversity Training While I am Still
Employed

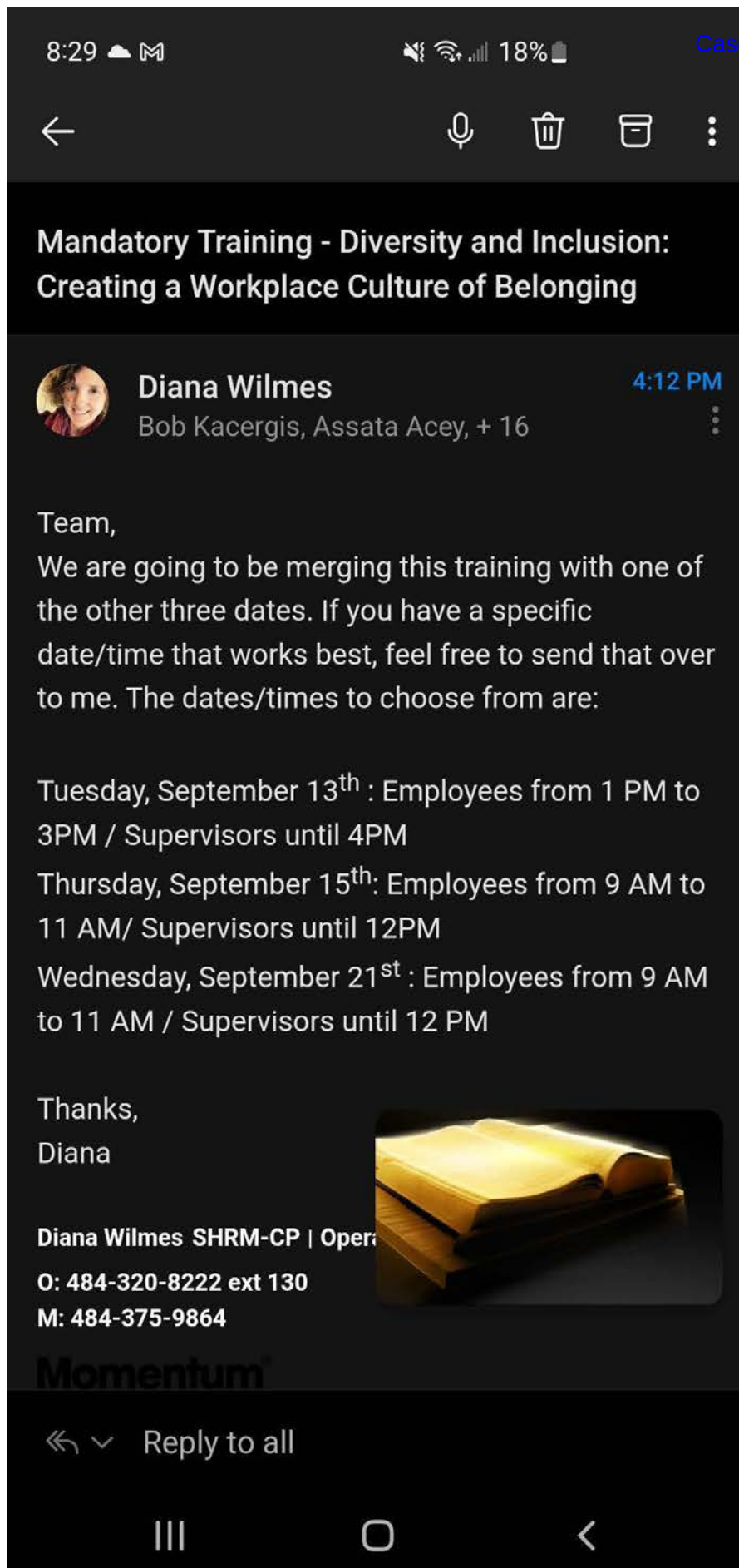


Exhibit 21- 2022- Wilmes Announces Training as
rescheduled to November While I
am Still Employed

PTE 73 (02/23/2022 Teams Messages between myself and my Supervisor, Doc 40 Transcript (II)(30), *originals filed in Doc 40-2 pp. 637-640*).

30. 02/15/2022 Adverse party statements between CAO and my supervisor about meeting to discuss the racial experiences I shared in my meeting with CAO (Ex. 317-318). References: ECF 8-1 (¶40(b), ¶42, ¶96-103), Doc 15 (¶77-78), ECF 15-49.

8:06:01 PM Judy: Sure I will be in tomorrow. I also want to speak to you about Assata and some things she shared with me. My calendar is up to date but regardless I will find time for you

8:11:00 PM Joren: Thank you. I'll see about booking a room if that's all right.

Re:Assata, okay, I appreciate it.

PTE 74 (02/10/2022 Text messages between myself and my Husband pp.1672-1673).

2/10/2022 16:07:49

I get what the sentiment that Judy expressed about wondering if x, y, or z is always racism or if questionable behavior is caused by something else. For me, I generally like to give people the benefit of the doubt and examples of really minor stuff that you've told me about have happened to me too at various times. Obviously in my case race wouldn't have been the motivation of certain behavior. But the thing I've learned recently is that I have suuuuch a different perception of race and we've talked about this before. I get to go out of my house and basically never have to worry if someone is being racist towards me and I never feel unsafe. When someone has a lifetime of experiences feeling unsafe and being forced to make judgment calls about a person and his/her behavior in the moment to inform your decision making as it relates to your safety, it changes things! It's something I can't relate to at all.

But, yeah, it may be true that not all questionable behavior you experience may be due to racism. It could be due to any number of things ranging from racism to the person didn't eat breakfast that day and their in a funk. But you're not gonna be in a position where you're likely to give someone the benefit of the doubt because of what I mentioned earlier! And that doesn't take into account the sociology angle that you talked about either.

I think Judy was looking for some reassurance or comfort of, "yeah it's true that maybe not everything I'm talking about comes from racism but..." even if you went on to rebut the premise, she would have latched on to the pragmatic statement that "it might not always be racism" and she probably wouldn't have heard the rest of what you said after that anyway. It may be true that not everything is about race, but it wouldn't be helpful in this case for her to hear that, because it almost isn't the point. The point should be that you don't have the benefit of giving people the benefit of the doubt like she does because of a lifetime of experiencing racism and the cost of being wrong--if you give the wrong person the benefit of the doubt and are wrong about it, it could be a fatal mistake.

Anyway, looking at it from that angle has really helped me understand things differently. I suspect a lot of others would also be like, "I have no problem giving whomever the benefit of the doubt so why can't you seem to do that too?" It's shitty because it makes you feel like something must be wrong with you, but they'd respond exactly the same way if they had the experiences you've had.

2/10/2022 16:11:09

Idk, it's a tough thing. People like Judy want to be comforted that things "aren't all THAT bad." And maybe sometimes stuff isn't all that bad but other times it is. Or, rather, maybe it's just this: sometimes there's nothing for the discomfort. Sometimes there's no comfort to be had. One might just have to sit in it and accept it and realize there is no magic pill to make it feel better. Well I love you

2/10/2022 16:12:19

This VW meeting is really slow lol. A lot of it could be addressed off-line in individual calls, but oh well

2/10/2022 16:12:46

Assata (+17702311017)

I mean ots fine bc with her I'm not trying to co Vince her of race. Im trying to discuss consequences of company looking bad, or possible lawsuits of a hotter headed employee gets offended in future

2/10/2022 16:13:14

Assata (+17702311017)

Otherwise it gets long and convoluted. And I can do that with you when I have energy I. But I'm not overly invested on her

2/10/2022 16:13:26

Assata (+17702311017)

Lol to meeting

2/10/2022 16:14:36

Assata (+17702311017)

Idk why we even have received 2:55 meeting when there's a separate chat and other meetings. They need to have one meeting with the MD folks who need to respond. And delegation to anyone who folks want to give less info to.

2/10/2022 16:14:46

Assata (+17702311017)

It's almost like having a fake meeting lol 😏

2/10/2022 16:14:54

Yeah I get you

2/10/2022 16:14:59

Lol yeah

2/10/2022 16:15:09

Assata (+17702311017)

Also I love you too

2/10/2022 16:15:58

I also want to back up and validate what you said re how you had to be super composed and talk slowly and deliberately despite feeling emotional and how that really sucked...

2/10/2022 16:16:19

I think it definitely is partly (or largely) cultural

2/10/2022 16:17:13

Assata (+17702311017)

And um yeah I think the thing about is everything racism is a natural response to a world where there's much more racial instances than someone imagined happening at one time.

It's often a redundant approach bc of the thousands of black folks who decide they are the problem or that other blacks are the problem and deal with chronic stress and anxiety of questioning if it's all in their head.

So usually every instance blk individuals are thinking if it's just them, and the stuff they express is after such thought

2/10/2022 16:17:39

Again, an example of where I'm not affected because the pa deutsch culture is very stoic and calm and reserved--like what you're describing on steroids. Blerg. Fine for me but shitty for you. Feels bad

PTE 75 (02/15/2022 Teams Messages between myself and my Supervisor, Doc 40 Transcript (II)(31), *originals filed in Doc 40-2 pp. 641-676*).

31. 02/15/2022 Excited utterance from myself to my supervisor about CAO's prior response to my shared racial experiences and his adverse party statement and present sense impression about CAO's interest in following up with him about these things (in addition to project management duties for a team deliverable) (Ex.319-336). References: ECF 8-1 (¶42, ¶96-103, ¶134-163), Doc 15 (¶77-78), ECF 15-62-15-63, Doc 20 (¶8-49), ECF 20-5 to 20-16, ECF 20-21.

8:14:56 PM Joren: Please do a review of all fixtures and tooling needs for a lie / cc va outside of the BoM, and provide a list. Looking for what fixturing we need to have more of if we're looking to run more builds in parallel. Is that something you'd be okay putting together a draft for by mid day Thursday?

Also, Judy wants to talk to me about some things regarding Assata. Please let me know anything you think I need to before going into a meeting with her tomorrow.

8:19:30 PM Assata: I can't im

agine what: either she wants to ask you what doctor I'm using, whether the nausea subsided, complain about me discussing racism at work with you vs her, ask if I'm starting trouble, asking for tips be I explained you have 50% of company's black women and 33% of companies black population where several groups go without women at all, maybe she wa to to know why I don't

enthusiastically jump at her emails

8:20:19 PM Assata: Would be a feeler to see how I'm "adjusting" to racial things at work or if I'm viewing everything as racist. At this point over a movie suggestion it's giving borderline harassment

8:20:50 PM Assata: But ye that's all I can anticipate her asking

8:22:25 PM Joren: Okay. No worries! I don't have more context but will fill you in where I can.

8:22:52 PM Assata: [Direct response to message from 8:14:56 PM] I can try to parse my notes for info on fixtures that aren't in BOM/are used in house

8:24:45 PM Joren: If I had to hazard a guess I'm on Jorge.

That would be cool too. Please start with ones on the document and then feel free to add ones in your notes too. There's questions to what would we need to have in house to run three builds in parallel.

8:25:37 PM Assata: That or to ask where I keep my notes when I report ppl doing weird stuff

8:26:35 PM Assata: Fair. Plausible deniability though. I don't know!

8:27:42 PM Joren: Please try and let it go, don't let her wreck your evening by letting her take up space in your head rent free.

8:27:46 PM Assata: She's been almost anxiously asking for those I guess to convince herself that it's not a lot or not too detailed and I simply have opted to not dredge my social logs for everyone at work to her

Bc 1: it's labor, 2: she keeps calling it optional 3: she works better trying to avoid issues than when she thinks she cana she's stuff

8:28:00 PM Assata: And nope she doesn't

8:28:42 PM Joren: She cana she's stuff?

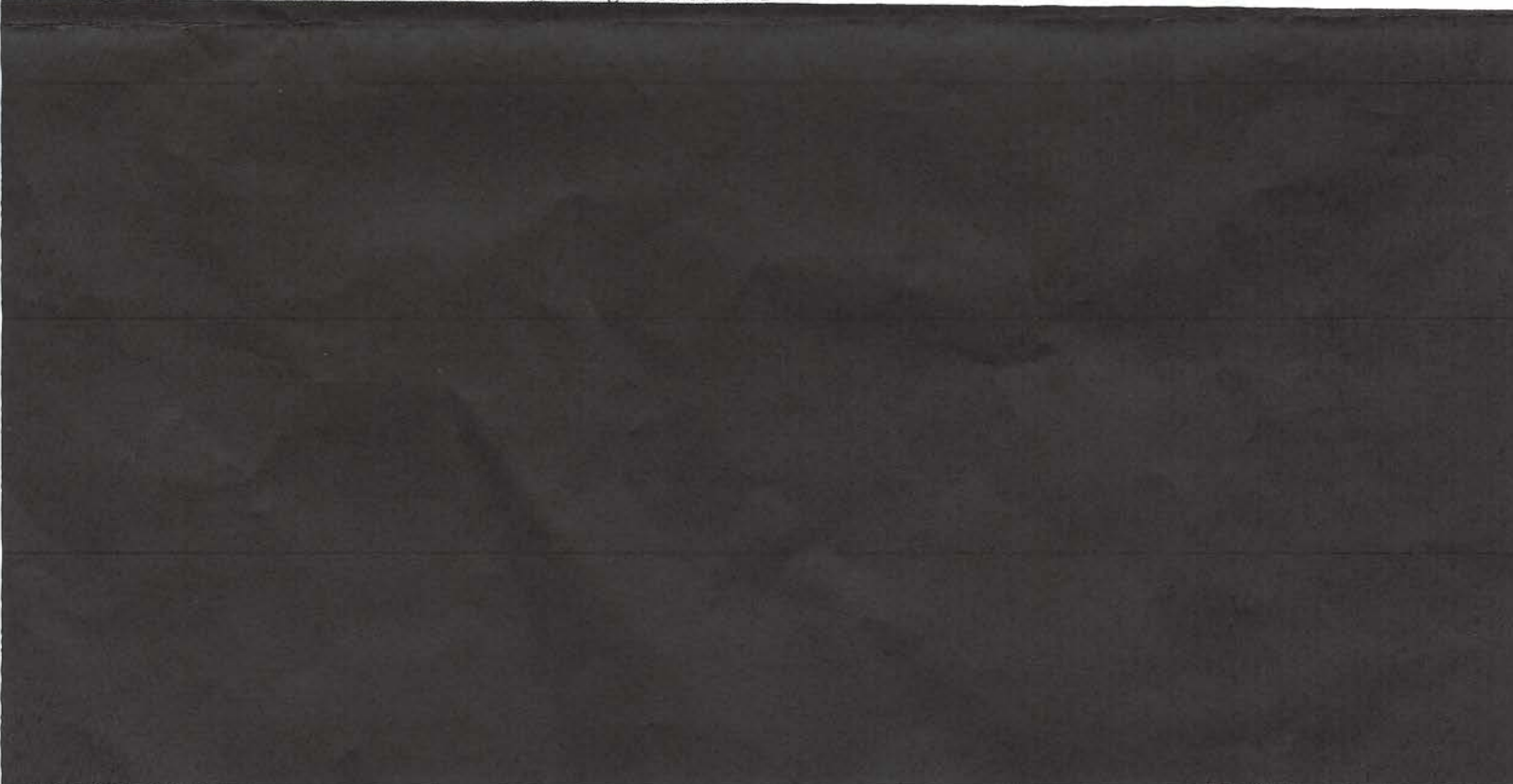
8:29:02 PM Assata: Lol

8:29:10 PM Assata: I read this in my head

8:29:29 PM Assata: When she thinks she can assess or judge things on her own

8:29:53 PM Joren: Ah. Yes

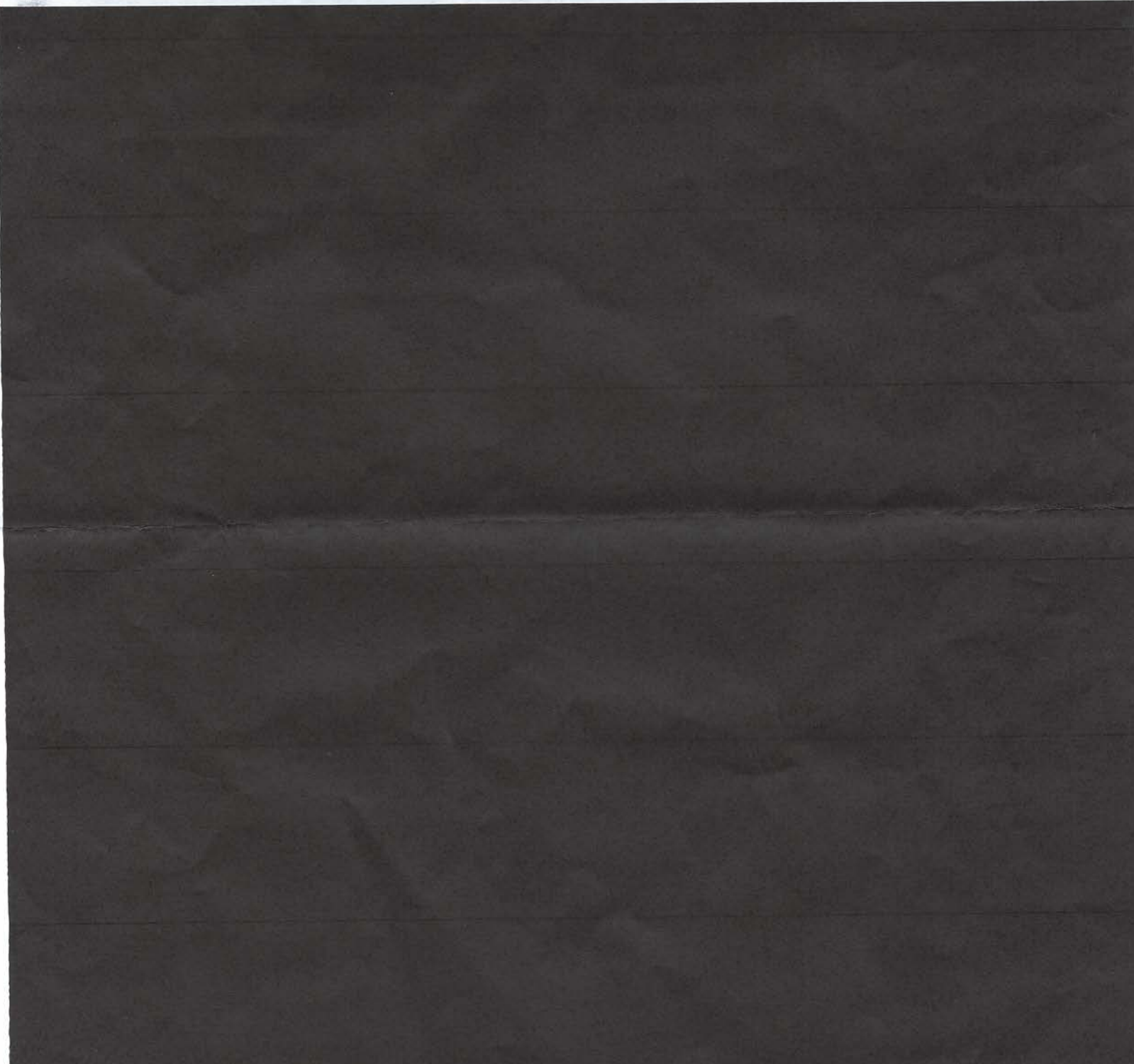
8:30:40 PM Joren: And goodnight. Salad time



**PTE 76 (04/11/2024 A. Acey Dep. pp. 161(114)-
164).**

45. On April 18 I emailed CAO to request access to unpaid time off and complained that the current PTO policy placed ill people on a short track for probation and encouraged employees to prioritize attendance over safe execution of tasks.
46. During CAO's insisted in-person meeting to discuss these concerns off record, I again shared my impression about a safety infraction where I:
 - a) Sought and received permission from Test Bay employees to view a model on behalf of a mechanical engineering employee.
 - b) Briefly approached the model while keeping my hands raised and exaggerated standing as far away as possible.
 - c) Responded to another employee's assertion of the dangerous voltage level in stating, "I know".
47. The safety report made about me had suggested that I was combative towards the Rob member when he tried to keep me from "touching" the high voltage model.
48. In my review, I expressed frustration that the accusations:
 - a) Were patently false.
 - b) Contrasted verbal or visual cues before and while viewing the model.
49. I also expressed concern that bias had motivated the misconception, since:
 - a) My perceived noncompliance contrasted with the electrical safety etiquette I had demonstrated over my time at the company.
 - b) Those who were accusing me routinely ignored the safety rules and each other's noncompliance.
 - c) My experience in high voltage testing, which I discussed with Rob when he interviewed me, contrasted the reckless behavior others had expected of me, as I was

trained to operate with voltages more than 30x of what the Test department was using.

50. HR responded to my concern about the bias behind the dismissed report and the stress it had caused me by stating that no one would have seen my resume to know my qualifications.
- 

PTE 77 (Complaint doc 8-1, ll45-50).

4 Q. -- she mentioned --

5 A. Right. She made a joke. She
6 didn't -- well, sorry. You're right.

7 She mentioned when the interview
8 team, which I assume to be Omar and Bruce,
9 asked her about her use of tools, as I
10 disclosed to you all earlier, she made a
11 joke. She didn't think they understood.

12 That wasn't a joke. I was
13 complaining about Bruce. I actually
14 complained about Bruce to Joren. He thought
15 it was strange. I told Judy, and she writes
16 it as a joke.

17 I didn't circle it, because for me,
18 like, this -- the stuff I circled to me said
19 more about how she saw me. This to me says
20 more about how she handles complaints.

21 Q. Do you agree with your
22 grandmother's testimony that you opined to
23 her that Ms. Talis doesn't know anything
24 about Human Resources?

1 A. I didn't say she didn't know
2 anything. I just felt like --

3 Q. What did you tell your grandmother?

4 A. -- she didn't know enough.

5 Q. What did you tell your grandmother?

6 A. I told my grandmother she did not
7 know enough, and I could not understand --
8 the things she was doing. It -- it just --
9 it didn't just feel wrong. It just didn't
10 feel smart.

11 I mean, for someone who cares about
12 their company, she -- she just -- she did a
13 lot of stuff that just didn't make sense.

14 Q. Okay. And your default, again, is,
15 if that's what taking place by somebody in a
16 position like that, who ostensibly was
17 trained like that, is to believe that there
18 must be some element of racial or gender bias
19 involved?

20 A. Yes. I mean, she's smart enough to
21 read the law. She -- she went to school
22 somewhere. I mean, I've talked to her. She
23 seems coherent, so I don't understand why she
24 would do things that are facially unethical.

1 and whether I saw racism everywhere. It just
2 felt like she was trying to psych me out.

3 And that type of behavior, if it
4 were to offend the wrong -- someone other
5 than me, someone more reckless than me -- I
6 personally felt that it -- it just felt dumb.
7 Like, I just don't understand.

8 Like, all she had to do to protect
9 the company was say that she -- was start the
10 training, or say that she would address some
11 of the people I talked to her about, but --
12 and even if she was ineffective and
13 insincere, it would have protected her, but
14 she chose not to do it.

15 I just can't understand that. From
16 a point of intelligence, I just don't get it.
17 It doesn't make sense.

18 Q. So, for example, her failure to
19 adopt ideas you provided to her relative to
20 celebrating Black History Month is -- would
21 be something that falls under the category of
22 what you've just identified, right?

23 A. No.

**PTE 78 (12/2021 Company Handbook p. 9
("Reporting of Harassment"), AA-19).**



depending on the totality of the circumstances, including the severity of the conduct and its pervasiveness:

- Unwanted sexual advances, whether they involve physical touching or not.
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life, comments about an individual's body, comments about an individual's sexual activity, deficiencies, or prowess.
- Displaying sexually suggestive objects, pictures, or cartoons.
- Unwelcome leering, whistling, brushing up against the body, sexual gestures, or suggestive or insulting comments.
- Inquiries into one's sexual experiences; *and*
- Discussion of one's sexual activities.

All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment and retaliation against individuals for cooperating with an investigation of sexual harassment complaint is unlawful and will not be tolerated at Momentum Dynamics.

REPORTING OF HARASSMENT

Any employee who believes he or she has been subject to or witnessed illegal discrimination, including sexual or other forms of unlawful harassment, is required to make a complaint. You may complain directly to your immediate supervisor or department manager, the CEO, or any other member of management with whom you feel comfortable bringing such a complaint. Similarly, if you observe acts of discrimination toward or harassment of another employee, you are required to report this to one of the individuals listed above.

No reprisal, retaliation, or other adverse action will be permitted or taken against an employee for making a complaint or report of discrimination or harassment or for assisting in the investigation of any such complaint or report. Any suspected retaliation or intimidation should be reported immediately to one of the persons identified above.

All complaints will be investigated promptly and, to the extent possible, with regard for confidentiality. If the investigation confirms conduct contrary to this policy has occurred, the company will take immediate, appropriate, corrective action, including discipline, up to and including immediate termination.

RELIGIOUS ACCOMMODATIONS

The Company will make every effort to accommodate an Employee's sincerely held religious beliefs and/or practices, unless to do so creates an undue hardship, which includes but is not limited to, unreasonable expense or difficulty, or unreasonable interference with the safe and efficient operation of the workplace. Where time off is a reasonable accommodation, the Company may require exempt Employees to make up the time at some other mutually convenient time. Any absence of a non-exempt Employee will qualify as PTO and will be deducted from the Employee's PTO bank accordingly. If a non-exempt Employee does not have any accrued PTO available at the time of the absence, the

**PTE 79 (06/2021 assigned onboarding
schedule and Anti-harassment Training Title
Page).**

**Onboarding Schedule****EMPLOYEE:** Assata Acey**LOCATION:** Momentum Dynamics Conference Room**Monday, June 14th**

9:00 AM to 9:30 AM	Office Tour, i-9, Covid-19 Protocols, Parking Map, Collection Voided Check Diana Wilmes, Operations & HR Coordinator
9:30 AM to 10:30 PM	Computer Setup Zack McCook, Manager, Information Technology
10:30 AM to 12:00 PM	BambooHR, 2021 Benefits Presentation, Handbook Overview, HR Connection Judy Talis, Chief Administrative Officer
12:00 PM to 1:00 PM	Lunch with Manager/Team Joren Wendschuh, Manager, Product Introduction
1:00 PM to EOD	Introductions, Safety Briefing & Management Meeting Joren Wendschuh, Manager, Product Introduction

Tuesday, June 15th

10:00 AM to 11:00 AM	Security Awareness Training Zack McCook, Manager, Information Technology
----------------------	---

Thursday, July 8th

1:00 PM to 3:00 PM	Diversity & Harassment Training Judy Talis, Chief Administrative Officer
--------------------	---

Wednesday, July 14th

1:00 PM to 2:00 PM	Patent Training Matt Ward, IP Manager
--------------------	--

TBD

1:00 PM to 2:00 PM	Intro to Momentum Dynamics with Bob Kacergis Bob Kacergis, Chief Commercial Officer
--------------------	--

Momentum Dynamics Corporation3 Pennsylvania Avenue, Malvern, PA 19355-2417 USA
484.320.8222

1

Diversity & Harassment

Creating a Whole and Inclusive Workplace

Momentum Dynamics



Janeen Olsen Dougherty *Judy Talis, CAO*
Grey Street Legal, LLC *Momentum Dynamics Corp.*

This Seminar is timely given the conversations taking place in this country about issues of social justice, equality and race. In order to keep everyone safe, we are conducting this seminar virtually, but there are opportunities for you to participate. Encourage questions and remind everyone that we need their participation in order to provide full credit.

PTE 80 (03/02/2022 Teams Messages between myself and my Supervisor, Doc 40 Transcript (III)(15), *originals filed in Doc 40-2 pp. 1632-1669*).

15. 03/02/2022 Excited utterance and present sense impression from myself to my supervisor about internal stress and barriers caused by the racial and gender harassment I experienced at work AND his adverse party statement of sending emails to the supply team through him to cope with some of these issues (Ex 808-826). References: ECF 8-1 (¶121, ¶124-129, ¶175-176), Doc 15(¶77-80).

4:03:31 PM Assata: re uniforms: how to get around it being a weekly charge?

4:03:46 PM Assata: Do I ask hary to purchase and coordinate?

4:04:15 PM Joren: Sure please.

4:06:07 PM Joren: And put in as "approval needed"

4:34:58 PM Assata: im so scared to send this email

4:35:06 PM Joren: Which one?

4:35:09 PM Joren: Wait

4:35:12 PM Assata: for lab uniforms

4:35:19 PM Joren: Ok. Pass through me then.

4:35:46 PM Joren: Just do everything as you would, just remove purchasing from the to line

4:38:55 PM Assata: done

4:49:34 PM Joren: I've noticed that the last 2-3 days you've been super aversive, in a lot of ways.

4:50:45 PM Assata: idk if its more or if Im being honest about why some tasks take longer

4:52:04 PM Assata: I also feel partially responsible for ppl hurting my feelings-like I should make it easier for them not to—I really want everyone to be happy and not just me. Jorges thoughts got unde my skin a bit and the world always screams about the perspective of the oppressive person in a situation

4:53:16 PM Joren: [*unproduced image*] You should not have to defend yourself for being uncomfortable. You're a human being with inherent value!

4:53:22 PM Assata: ["Joren Wendschuh You're saying you're stressing out over things much more often in the last few days. Some things you didn't worry about before, outwardly["]. yes. like Im trying hard to be honest about my blockers so stuff can get done. 1 am also more invested in how everyone feels. I think being more overwhelmed allows me to care less about others

4:53:38 PM Assata: ["Joren Wendschuh ☹️ You should not have to defend yourself for being uncomfortable. You're a human being with inherent value!["] noted, will try to balance myself

4:53:50 PM Assata: I am going on a tip to my fav cupcake shop soon

4:53:54 PM Joren: By default you have value and should be treated with respect, and your boundaries honored

**PTE 81 (04/18/2024 A. Acey Dep. pp. 69(113)-
70(115)).**

3 Q. Is it fair to say that a
4 certain amount of your therapy was also
5 dedicated to, you know, issues involving your
6 relationship with your eventual husband, I
7 guess, Mr. Hackman?

8 A. Yes.

9 Q. Okay.

10 A. We argued a lot about race and
11 my experiences at work as well.

12 Q. Well, when you say you argued
13 a lot about race, did he not have quite the
14 same view of race-based treatment of you as
15 you did?


16 A. Yes. When we started working
17 -- well, when I started telling him about
18 these things around October of 2021, how
19 stressed I felt about HR and the people at
20 work, he asked me if I thought I might be
21 depressed, and I was angry because I felt like
22 my emotional response to what people were --
23 to my perceived treatment was normal.

24 And we argued about race a lot.

ASSATA ACEY

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1 I mean, he grew up in a mostly homogenous
2 area, German settlers. He's Pennsylvania
3 Dutch. They're from Ephrata. You know, he
4 grew up on a farm. So we had very different
5 experiences regarding race and ideas on race.



PTE 82 (04/09/2024 D. Hackman Dep. pp. 43

(ll16)- p45 (ll23).

16 Q. During your time at Momentum did you
17 notice behavioral changes in Ms. Acey?

18 In other words, was Ms. Acey acting
19 different?

20 A. Is your question did I notice a change
21 in her over time while she was employed there?

22 Q. Let me strike the question.

23 When you and Ms. Acey worked together
24 at Momentum, did you notice Ms. Acey's attitude

DANIEL HACKMAN

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1 toward work change?

2 A. Can -- can I ask a clarifying
3 question?

4 Q. Sure.

5 A. Do you mean her attitude towards the
6 actual work that she's doing, or do you mean her
7 attitude as it relates to how she feels about the
8 company or her coworkers?

9 Do -- do you understand the
10 distinction?

11 Q. Yes.

12 I'm asking generally.

13 Did you notice her -- her attitude
14 change; yes or no?

15 A. Yes.

16 Q. Okay. How did her attitude change,
17 specifically?

18 A. Specifically. She -- around the time
19 that I first met her, I observed her to be -- I
20 would qualify it as vivacious and outgoing, almost
21 bubbly in her personality. I've known her -- I --
22 I knew her to be very hardworking. She would
23 often work very late and put in overtime hours.

24 As time went on, I noticed a very

DANIEL HACKMAN

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1 marked difference in -- in her general demeanor
2 and wellbeing. I observed over time that she
3 became less energetic, complained of feeling
4 unwell, complained of having headaches, complained
5 of feeling vertiginous or dizzy. As time went on,
6 the number of times that she vented complaints or
7 upset or frustration, disappointment, about
8 treatment from her coworkers increased, as well.

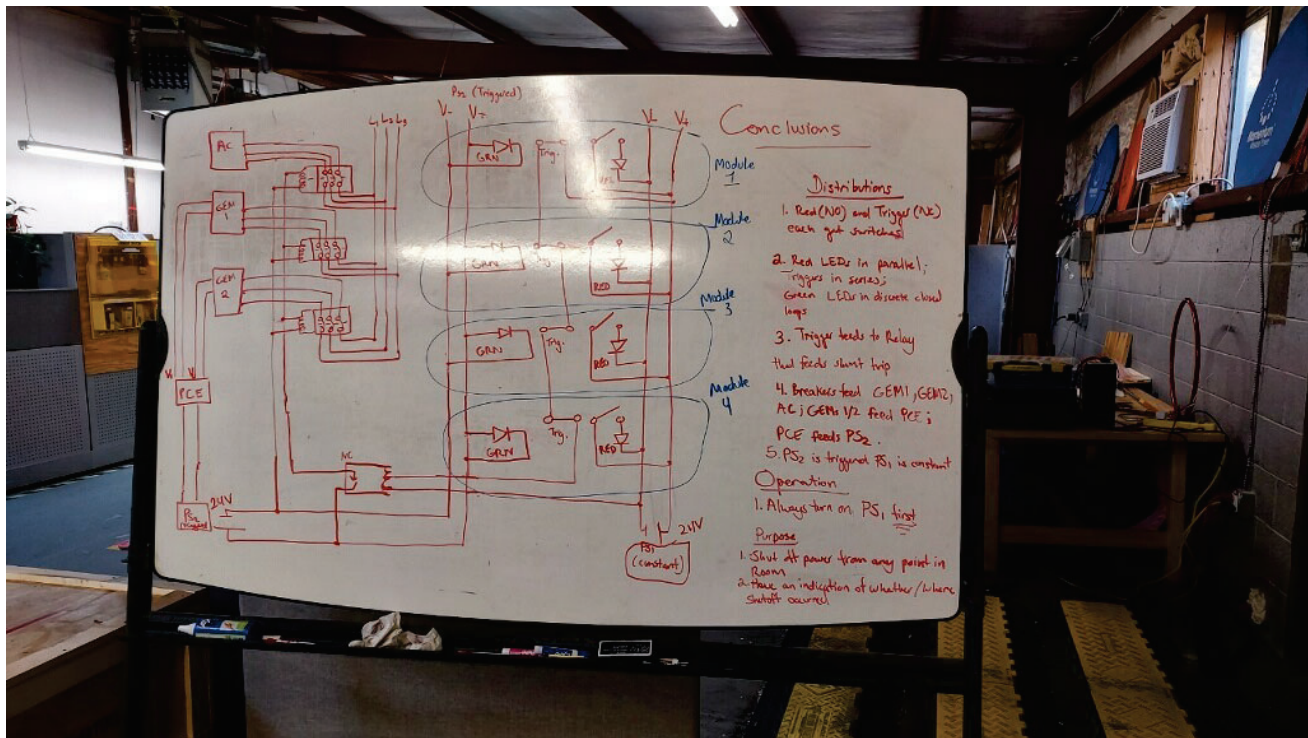
9 Q. Okay. When did you and Ms. Acey start
10 dating?

11 A. You're going to get me in trouble. It
12 would have been shortly after we, like, had our
13 first conversation at work, which that -- that
14 occurred on the -- I believe the 27th of October,
15 2021, and we would have started dating shortly
16 thereafter. Within a number -- within a couple of
17 weeks, probably, of that.

18 Q. At -- at -- at any point from when you
19 first started dating Ms. Acey to the -- to when
20 you left InductEV, were there ever situations in
21 which your relationship with Ms. Acey would be
22 strained for any reason?

23 A. Yes.

**PTE 83 (11/12/2021 Multi-Switch Emergency
Stopcircuit Final Board Schematic; 09-24-
2021 Cost-Tiered Primer Surface Energy
Consult; 01/10/2022 Laser Classification
Calculation; 11/30/2022 Coil Connector
Limits Test Plan).**



From: Jerry Frank
Sent: Friday, September 24, 2021 1:03 PM
To: Assata Acey
Cc: Ben Cohen; Joren Wendschuh
Subject: Thank you

Assata,

Thank you for the suggestions. I appreciate the thoughtful and well-reasoned response. Luckily, it looks like OPS just got word that the product hold on the primer is over and we will be getting our supplies on Monday.

Again, many thanks.

Assata's response begins here -

Hi,

I know your original question was about increasing surface energy. As an alternative to changing the primer,(which would take more investigation), I have three suggestions to maximize the surface energy, which may be more accessible(some may also be used together) hope it helps.

A. Reduce condensation

Application: Consider applying primer(and Epoxy) in a dry environment. Consider a dehumidifier, or even connecting one to a pressure controlled chamber.

Reasoning: Synthesis

1. The synthesis of organosilanes often leads to a byproduct of water. Every reaction can go backwards, so removing water from the environment will keep the primer concentrated
2. Organosilanes can also react to metals to create water..a dry environment can aslo combat this and avoid condensate layers that could bond in between layers and weaken a bond over time.

B. Apply Heat

Application: Finding out a sweet spot between max heating temp and cure time needed to apply primer

Reasoning: Weak Boundary Layer Theory, and chemistry

1. Weak Boundary Layer: Microscopic openings/ridges in the silicon as well as rigidity to applied primer can create small failures along the boundary between layers. Decreasing viscosity will allow the primer to seep into those imperfections. This can also be effective as a method when adding epoxy between primer layers
2. Chemistry: Two major methods to lower viscosity include heat and adding solvents. A useful solvent would have to be thoroughly researched and possibly made. Commonly used solvents(alcohol based) can mix well but decrease long-term performance, encourage cracks, and vastly increase curing time.

C. Controlled Apply Pressure

Application: Consider pressurizing silicone with similar set up used in air bubble removal, with nitrogen gas.

Reasoning:

1. Applied pressure can increase bond strength, but also important not to push the primer out and inadvertently thin its layer.
2. Using nitrogen will allow for a more controlled method than the bricks, without introducing additional moisture from air.

D. Consider Interlocking

Application: Consider 3D printing a a very shallow/very thin mold to overlay the silicone while it sets (can be tricky)

Reasoning: *Mechanical interlocking*

1. The surface will already not be smooth, having strategic ridges will enhance the chemical bonding
2. An acute-angled dovetail pattern will add to bonding strength in every direction, and not just the direction of the applied force.

**Jerry Frank | Electrical Engineering Manager
Momentum Dynamics Corporation**

3 Pennsylvania Avenue, Malvern, PA 19355
OFFICE 484.320.8222 | [Momentum](#) | [Who We Are](#)
Jerry.Frank@MomentumDynamics.com

Grand Prize winner of the 2015 SAFE Energy Security Prize

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Product (1/4)

lens type- would inform the spot size/intensity from a specific distance.
 not so much the only source of that combo, but a calibrated source to
 provide that intensity evenly across the spot diameter

365 nm Wavelength:

Spot Diameter	3mm	4mm	6mm	8mm	10mm
Light Intensity	13,000 mW/cm ²	7,300 mW/cm ²	3,250 mW/cm ²	1,800 mW/cm ²	1,200 mW/cm ²
Irradiation Distance	10mm	12mm	20mm	25mm	30mm

*full product PDF can be found in folder.

UV Laser Max Energy (2/4)

For the 365nm laser with 10m dot, the power is 1,200mW/cm²
 this is 1.2W/cm²

For a dot of 10mm diameter, this leads an area of $\pi \cdot r^2 = \pi(5\text{mm})^2 = 78.54\text{mm}^2$
 which is 0.7854cm² because 1cm²=100mm²

Power output is then

$$(0.7854\text{cm}^2) \cdot 1.2\text{W/cm}^2 = 0.9425\text{W} = \mathbf{0.9425\text{J/s}}$$

- ➔ For an exposure of 30 mins, or 1800s this becomes $0.9425 \cdot 1800 = \mathbf{1696.5\text{J}}$ for max Exposure during 30 mins of application.
 *this is the estimated time for 8 beads of glue, each needing 3 angles of applied UV, for 60s per angle
- ➔ For an exposure of 8 minutes, or 480s, this becomes $0.9425 \cdot 480 = \mathbf{452.4\text{J}}$
 *This is the estimated time for if each bead gets 1 spot on 60-sec curing or
 we purchase 2 more lasers to position over bead at different angles and run simultaneously.

**the latter case could counteractively also multiply the exposure amounts.

AEL Limits for 365nm UV light exposure (3/4)

According to 3.2.3.4.1, Class 1 AEL= MPE*area of limiting aperture. These are based on energy effecting unaided eye.

From Tables 5a, 8a/b:

MPE for eyes with 365nm for $\pm 10\text{s}$ is **0.9958J/cm²**,

*MPE for skin is 1J/cm², but eye-MPE is used in classification

Limiting (AEL) aperture diameter with 365nm for $\pm 10\text{s}$ is 3.5mm. The corresponding area is $\pi(0.5 \cdot 3.5\text{mm})^2 = \mathbf{0.096\text{cm}^2}$

Therefore, our class 1 AEL= $0.9958 \times 0.096 = 0.095597\text{J}$

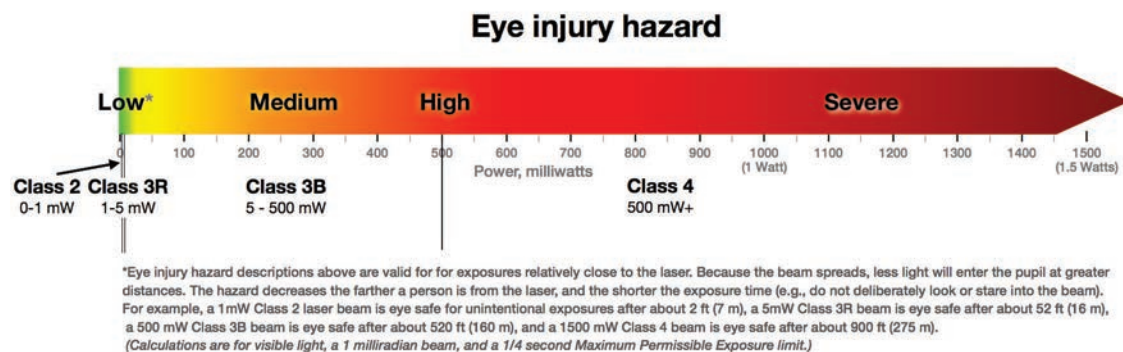
*Aperture and MPE for $t > 10\text{s}$ are applied due to 60s needed for glue to cure under UV.

Classification (4/4)

Class 1 AEL is $0.095597\text{J}/\text{cm}^2$.

- ➔ Because max intended exposure at 30mins (1696.5J) or 8min (452.4J) exceeds the range of 1-5x class 1 AELs (0.0956-0.47799J), **both Class 1, Class1m and Class 3R are out**
*Uses sections 3.3.3.1 and 3.3.1.2
- ➔ Because our wavelength is beyond visible spectrum, **Class 2, and Class 2M are out**
*Uses section 3.3.2
- ➔ Because laser power-calculated as 0.9425W for 10mmdiameter spot- is greater than 0.5W AND energy at $t=0.25\text{s}$ - calculated as $0.25\text{s} \times 0.9425 = 0.2356\text{J}$ - is greater than 0.125J
The laser **does not qualify for Class 3B designation and MUST be classified as a class 4 laser.**
*Uses sections 3.3.3.2 and 3.3.4

Chart from Laser safety facts, uses their own calculations from ANSI for visible spectrum lasers and adds visualization to class 4 designation



*It is important to note that:

1. our power is 0.9425 W over given area.
2. LEDs tend to be less harmful due to being an extended source instead of point source, however
3. The rules for lasers in the UV range are more stringent than that of visible range

*Notes 2 and 3 in reference to section 3.3.3.2, and the full 136 ansi standard, respectively.

Functionality definitions and test notes:

1. protect the device from obvious failure points
2. Functionality should be determined by providing usual inputs to device and monitoring its outputs. further investigation can go into doing this under load
3. Testing should not expose the wiring that would be otherwise bonded to the bus. Temperature/sand/heat may exceed normal conditions but should not contact sample parts that wouldn't otherwise "see" these effects.
4. Average amounts for sand testing should be average(max sand experience)

Simulate measured impact.

1. environmental deterioration

heat, temperature(how long will it take for heat and moisture to break down device performance)

(hot salt bath, cold salt bath)

answers the questions of:

how quickly hot water will deteriorate stuff

how quickly cold+moisture will effect product

these baths could have massage/vibration pads underneath to provide accelerated results

samples should be placed in an enclosed (dehumidified?) chamber/allowed to dry out for several days before functionality testing. cycles may be repeated to reasonable testing or until samples fail.

2. Sand-wash

-Have item in a fixed position/cover parts that would normally be connected to the bus either, fill container with sand, glue a harness to edge of washing machine and mix that way or create wind in a closed environment--better for realistic functionality testing

do 3 and 3

3 samples get cleaned, 3 samples do not
test above av

av

under average max sand impact levels

method 2: take a clear enclosed plastic tub, attach harness to hold sample to wall of said tub, hook a fan to the bottom and sea area. maintain a, above av, and under av concentration of sand per volume of air and low air around device to simulate sand corrosion.

may be effective to position device the way it would be on bus.. so that it is angled in the way it would be towards the road etc

3. Current

-quick and dirty testing (2 samples) will each be stepped up in increments of 0.2 normal current from 40% to 200% or reasonable high fluctuation, 1s applied current, then functionality checked.

-(4 samples) samples shall have 40% 80% 100% current applied over 3 days, with daily functionality check to see if there's any deterioration.

**PTE 84 (04/09/2024 D. Hackman Dep. pp.
106(116)-110).**

16 BY MS. ACEY:

17 Q. Mr. Hackman, have you seen this
18 picture before?

19 A. Yes.

20 MR. LONGO: Objection. Form. Beyond
21 the scope of direct examination.

22 THE WITNESS: Yes.

23 BY MS. ACEY:

24 Q. Did you ever see this in person?

DANIEL HACKMAN

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1 MR. LONGO: Same objection.

2 THE WITNESS: Yes.

3 BY MS. ACEY:

4 Q. Do you -- when did you see this in
5 person?

6 A. I -- oh, I think that was -- that was
7 probably the end of October, maybe the beginning
8 of November, of 2021; I think.

9 Q. Do you know who drew this?

10 A. You did.

11 Q. Do you know who made the design in
12 this image?

13 MR. LONGO: Objection. Form. Beyond
14 the scope of direct examination.

15 THE WITNESS: Yes, I believe you did.

16 BY MS. ACEY:

17 Q. And do you know what this design was
18 for?

19 MR. LONGO: Objection.

20 THE WITNESS: I believe this was --
21 God.

22 BY MS. ACEY:

23 Q. Do you recall what the design is for,
24 Mr. Hackman?

1 A. I believe that it was related to
2 switching the -- I -- I believe it was related to
3 switching, like, fan or pump motors for cooling
4 system; I think. I don't recall, but it was
5 something like that.

6 Q. Okay. At the time of this project, or
7 at the time of this design, were you aware of any
8 complaints by me of my role at InductEV?

9 A. At that time? No.

10 Q. Have we ever discussed this image
11 relating to my role at InductEV?

12 A. We may have. Around the time that you
13 drew it, I remember you being -- I remember you
14 expressing and taking pride in the design.

15 Q. From your understanding, is this a
16 design that technicians at InductEV would be
17 expected to create?

18 MR. LONGO: Objection. Form.

19 THE WITNESS: No.

20 BY MS. ACEY:

21 Q. Can you explain why or why not?

22 MR. LONGO: Same objection.

23 THE WITNESS: That kind of design work
24 is consistent with work conducted by an

1 electrical engineer.

2 BY MS. ACEY:

3 Q. Were you aware of the -- were you
4 aware of the liability associated with this
5 design?

6 MR. LONGO: Objection. Form.

7 THE WITNESS: Yes. Somewhat I was.

8 BY MS. ACEY:

9 Q. Can you describe that, please?

10 A. Yes. This, I believe, was meant to
11 provide power switching or switching of power to
12 components of the cooling system on the ground
13 side electronics of a wireless charger, if --
14 which -- which had to be very high reliability
15 because if that switching failed, then it would
16 result in overheating which could cause damage to
17 the hardware.

18 Q. Could you tell me where in this image
19 you see any reference to a cooling system?

20 Let me know -- I want to make sure you
21 can see the whole picture is being viewed.

22 A. Oh, okay. So, no, I don't -- I don't
23 think I do see a reference to a cooling system.
24 This -- this actually looks like -- this actually

DANIEL HACKMAN

Page 110

1 looks like a power distribution scheme providing
2 three phase AC power to what we refer to as the
3 GEMS, the ground electronics modules.

4 Q. Okay. I'm going to stop sharing my
5 screen.

6 Do you recall anything about a UV
7 project?

8 MR. LONGO: Objection. Form.

9 THE WITNESS: Can you state that
10 again?

11 BY MS. ACEY:

12 Q. Do you recall anything about a "UV
13 project"?

14 A. Yes.

15 MR. LONGO: Same objection.

16 THE WITNESS: Yes.

17 BY MS. ACEY:

18 Q. Were you involved in this project?

19 A. Informally, yes.

20 Q. Did this project involve calculations?

21 A. Yes.

22 Q. Who completed those calculations?

23 A. You did.

PTE 85 (12/04/2021 Performance Evaluation

Excerpt, Doc 20-17 p.2).



2021 ANNUAL PERFORMANCE MANAGEMENT

CAREER DEVELOPMENT AND GOALS:

Where do you want to grow in your career? How can we help you get there through education/training, experiences?

[Growth]

With momentum Dynamics, I am seeking to deepen my hands-on skills and continue gathering information from my team and surrounding coworkers on issues in the assembly and problem-solving process.

1. I want to know the implications of various designs, not just theoretically, but how:
 - they translate to assembly steps
 - how these steps along with formal collaborative lines can inform labor times, longevity, quality
2. I want to learn more about how we channel concerns and how it can affect the way product knowledge travels from hands on parts of the company to theoretical parts.
3. Beyond this I am excited to view and learn the backend lifecycle of these products:
 - how they are tested and repaired after delivery, and
 - the performance factors that can uphold an image of reliability and value in Momentum's products
4. Further still, I am interested in building my theoretical knowledge in the materials science aspect of engineering.

[Help]

I feel that much of my goals can be met through observing and gathering information from my position over time, in addition to training. I know there can be conferences and or formal training around topics like efficiency, collaboration, innovative team structures and I would be open to those. So long as my role and compensation continue to match my tasks, I am excited to continue my pursuit of growth at Momentum Dynamics.

What do you consider to be your most important goals in the next year?

My goals in the next year are to:

- a) do my part to get cabinet builds/assembly docs as streamlined and close to target as possible
- b) develop more hands -on knowledge of product to learn more about the experiences of other sub-assemblies from my team
- c) continue to document new and old issues as they come to my attention to save time/money and enact improvement
- d) continue to support a positive work environment by doing my part for inter and intrateam coordination

**PTE 86 (02/09/2022 Email from myself to my
Supervisor). Add text message**

Message

From: Assata Acey [Assata.Acey@momentumdynamics.com]
Sent: 1/10/2022 6:36:38 AM
To: Joren Wendschuh [joren.wendschuh@momentumdynamics.com]

- [1.Today](#) I want to update the math for the math for the actual energy out put of the laser,
2. Add safety rules for signage amd how to navigate the room
 3. Add safety rules for skin exposure and required visor shade
 4. Put aside procedural suggestions/changes for not being in the room. *
Should I call Jed and ask about possibility of using 2 lasers and leaving room etc or is that something you want to discuss with Jerry Frank
 5. Update the ppe paragraph for the laser with refences and updated PPE specs
 - 6.add photos
 7. Research and type up description for process engineer

Assata Acey | Technician
484-320-8222 ext 178



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From: Assata Acey
Sent: Sunday, March 27, 2022 9:51 PM
To: Joren Wendschuh <joren.wendschuh@momentumdynamics.com>
Subject: RE: 2022 work plan notes

Alrighty, I revisited this , boiled stuff into concise wording and meditatively tweaked it towards tasks I enjoy and feel confidence and excitement towards doing. I think there may be additional untyped benefits to some competencies (ie: dept information can also inform improvement of documentation), but I tried to focus on the emphasis of each additional task, as documentation review is a task each tech is involved in.(it also seemed to clutter the document)
Let me know what you think!

From: Assata Acey
Sent: Wednesday, February 9, 2022 4:40 PM
To: Joren Wendschuh <joren.wendschuh@momentumdynamics.com>
Subject: 2022 work plan notes

Assata Acey | Technician
Momentum Dynamics Corporation
[Fueling the Future of Electric Transportation](#)
3 Pennsylvania Ave, Malvern, PA 19355

One attachment • Scanned by Gmail



Assata Acey Assata.Acey@momentumdynamics.com via [mtmdyn.o...](#)
to me



9 May 2022, 00:24



**PTE 87 (02/10/2022 ANSI Safety lens
calculation; 02-16-2022 ANSI Laser PPE and
Administrative Controls Determination; 02-
24-2022 Corrective Procedure; 03/27/2022
JIRA Roadmap Presentation Notes).**

lens shade has to do with wavelength and OD

From 4.6.2.5.1, we get eqn fo OD:

H =potential eye exposure level, *same units as MPE

D_{λ} =optical density

D_f = limiting aperture

τ =transmittance of filter at wavelength

$D_{\lambda} = \log_{10}[(H/MPE)] = -\log_{10}[\tau]$

This is also repeated as eqn B98 on page 182

*According to Table 4, There are charted values for 400-1400nm,
but wavelengths outside of that must be calculated.

Finding H -

H -for worst case OD calc is equal to radiant energy/limiting aperture area

this is equal to the intensity of the laser

Our laser intensity is given as 1.2 W/cm^2

*this is also in line with 4.6.2.5.1 rule that H be in the same units as MPE (W/cm^2), and defined as Exposure

Finding MPE

4.6.2.5.2 (3) p46

Diffuse viewing criteria:

For an extended source like LED, or diffuse beam reflection with

intermediate viewing time (ie optical alignment), MPE should be based on max viewing
time in an 8 hour period

Laser Safety Notes P.2 PPE

***general Info

4.6.1 p42

The preferred to enclose the beam path/equipment as this will minimize the hazard.

-PPE(goggles, barriers, window, clothing) are to protect against unavoidable direct or reflected beams above MPE.

-Some class 4 lasers cannot be made safe, and instead can damage PPE

**Environmental safety info

4.6.2.1 p42

protection for class 4 lasers/laser systems to be administratively required. use should be enforced when ppe/engineering/procedure can't be tweaked to avoid exposure > MPE

Eyewear:

- can include goggles, face shield, spectacles or prescription eyewear for $E \leq MPE$

-should withstand direct or diffusely scattered beams with a specified damage threshold \geq worst case exposure during use

-Should request test data from eyewear manufacturers(esp for nonlinear effects like saturable absorption)

4.6.2.2

-UV lasers/systems require "particular care" including, creation of hazardous byproducts(ex: ozone, skin sensitizing agents, LGACs)

--need beam shields and clothing to reduce to $E < MPE$

-both eye and skin protection needed for open beam Class 4 and 3b UV lasers

***General info

4.6.2.4 p44

eye protection selection should consider:

laser power and/or pulse energy, wavelength of output, potential for multi-wavelength operation, worst case radiant exposure, exposure time criteria, MPE, optical density of eyewear filters at output wavelengths, angular dependence of protection, requirement for antifog design/coatings, degradation of filter

media(ex: photobleaching), material resistance to trauma and shock(ANSI Z87.1-2003), radiant exposure and time factor combos where safety filter characteristic change, need for side shield protection/prescription glasses, maximum peripheral requirement, "visible light transmission, requirement and assessment of the effect of eyewear on task performance"

*****calculations info

4.6.2.5.1

Optical density goes by the wavelength and not the laser(ex: tunable lasers may have different densities)

-indirect viewing can be useful to avoid tons of eyewear(image converters/closed circuit tv)

H =potential eye exposure level, *same units as MPE

D_{λ} =optical density

D_f = limiting aperture

τ =transmittance of filter at wavelength

$D_{\lambda} = \log_{10}[(H/MPE)] = -\log_{10}[\tau]$

*when laser beam diameter $< D_f$, H = average beam energy over aperture

*don't do this where beam diameter $< D_f$

Table 4 has optical densities for H/MPE values

4.6.2.5.2 p45

Duration of intended use is the time factor in MPE equation

a filter material's OD calculation

subsections (1)-(3) are time factor criteria for classes 3B and 4

4.6.2.5.2(1)

visible criteria: for lasers 400-700nm not intended for long term exposure, 0.25s is the time used in MPE eqn bc the human aversion time for bright light is first line of defense

4.6.2.5.2(2)

Near infrared criteria: when point source 700-1400nm laser isn't intended for long exposure, 10s exposure time is realistic for MPE bc of natural eye motions. backed by 8.2.2

4.6.2.5.2 (3) p46

Diffuse viewing criteria:

For an extended source like LED, or diffuse beam reflection with intermediate viewing time (ie optical alignment), MPE should be based on max viewing time in an 8 hour period

*for a 400-700nm extended source with no intent of long term viewing, $t=600s$, which is ok t value for alignment, but should be increased if used for surgery

*see section 8.1 for extended source criteria

--if Extended source beam is too small for section 8.1 [or angular source size $< \arctan(r/d)$, inverse square law relationship can be combined with point source criteria for

$$E = \rho \cdot \phi(\theta) \cdot \pi(r^2)$$

E = irradiance at distance r from diffuse surface.

ϕ = laser output ρ = reflection coefficient of the surface,

θ = viewing angle relative to normal of the surface

(4) if long term exposure/30,000=24hrs is possible, it should be used as t for MPE except for UV, where according to section 8.2.3.1, additivity can happen

4.6.2.6

OD should be weighted with folks need to see the laser

***** Labeling and inspection and standards of Eyewear

4.6.2.7

eyewear should be labeled by OD and wavelength for protection

*4.6.5 and 4.6.5.1 say labels should be permanent

4.6.2.8 p46

clean per manufacturer specs

check annually in attenuation material for pitting, crazing, discoloration, cracking etc, mechanical integrity of frame, leaks/damage in coating

-discard or test suspicious eyewear

4.6.2.9 p47

eyewear companies must provide wavelength and OD, laser safety data, as expressed in Appendix C (ex: damage threshold), and Manufacturers recs for shelf life, storage, cleaning and use

***** Environmental Safety Barriers

4.6.3 (windows) p47 and 4.6.4 (entryways) p47

-exterior or interior windows within NHZ of class 3B or 4

lasers/systems should have screen/barrier/filter to reduce transmission below MPE

-Controlled entryways should have a barrier/curtain screen to block/filter exiting light to levels below MPE

-flammability, combustability, and nontoxic decomposition of, or through window/ or window/entryway barrier are all important to minimize

-Total hazard evaluation and specific application of any barrier should dictate the damage threshold sought(incl exposure time for given beam)

*this is explained further in appendix C

-NHZ analysis is needed to confirm safety for scenes that extend from floor to ceiling

****Safety Labelling

4.6.5

All protective equipment shall be permanently labelled

4.6.5.1

-Eyewear should be labeled with OD and the wavelengths where it protects

-Color coding or other markers are encouraged for where rapid identification is needed/multilaser environments

4.6.5.2 p48

All protective windows sold as their own product should be labeled with the, OD, specific wavelengths, barrier exposure time limit and conditions for protection

*supported by 4.6.2.4

4.6.5.3

-permanently mounted collecting optics (laser) filter housings that are sold as their own product should be labelled with OD, wavelengths of use, TL(threshold limit), related exposure time, and the conditions for protection

*supported by 4.6.2.5

4.6.5.4

Laser protective barriers sold as their own product(other than as integral part of a product)should be labelled with, barrier exposure time to threshold limit and, the conditions of protection; other should be provided by manufacturer

*supported in Appendix C2.3

4.6.5.5

-All laser viewports and films sold as their own product should be labeled with OD and spectral region of protection;both should be provided by the manufacturer

*backed up by Appendix C2.3

4.6.6

some lasers(ex:excimer lasers in uv), skin covers should be used if repeated exposures are anticipated at or near the MPE for skin

-UV lasers 295-400nm and or laser/welding/cutting application, have particular potential to damage skin

-for these, skin covers and or "sun screen" creams are recommended.

-tightly woven fabrics and opaque gloves are give best overall protection

-a labjacket or coat can also fill the requirement, most gloves give some protection

*Consider flame resistant Materials for Class 4

- "large area" exposures in wavelengths over 1400nm should be minimized due to possible cause heat loading and thusly skin dryness, and heat stress after excessive exposure. ((8.4.2)
chronic exposure may have un-understood long term health effects

4.6.7

- Respirators, addtl local exhaust ventilation, hearing protection and fire extinguishers can be needed when dangers can't be prevented through engineering

***Warning signs

4.7

4.7.1 p48

ANSI Z535 is the guide for safety sign size, letter size and color

*also shown in figures 1a and 1b for rules for lasers of all classes

4.7.2 and 4.7.2.1

There are two similar laser symbols and designs that are accepted

4.7.2.1.1.

The laser hazard symbol should have a sunburst pattern with 2 sets of different length radial spokes with one long spoke coming (horizontally) from a common center

*specified in ANSI Z535

*this is for area warning signs, or as specified in 4.7.3

4.7.2.1.2

Laser hazard symbol shall be the same as 4.7.2.1.1 but with equilateral triangle around it

*also specified in IEC 60825-1:200

4.7.2.2

safety alert symbol=indicates potential safety hazard

*is an equilateral triangle around an exclamation mark

*from ANSI Z535.3-1998 safety symbol criteria

*goes on the left of "danger"/ "caution", but not "notice" signs

4.7.3 p49 (also combined with 4.7.3.1-3, p50)

Purpose and statements of Class 3R/B or 4 laser area warning signs

- sign is a rapid visual alert of:

1 and 3) laser hazard in area and severity(class, NHz, etc)

2 and 4) specific policy in place, and actions to avoid hazard(eyewear, etc)

***Statements/meanings as defined in section 5 of

ANSI Z535.2-1998 or latest:

a) "danger"-most extreme conditions, where death/serious injury are imminent if hazard isn't avoided

*according to 4.7.3.1, this is to be used for all labels and signs for lasers/systems that exceed their MPE, OD and wavelength of eyewear should be included if the area requires eyewear

b) "caution"-alert against unsafe practices due to potential hazard of minor or moderate injury

*according to 4.7.3.2, to be used with Class 2 and Class 2M Labels and signs-so long as laser/systems don't exceed applicable MPE

c) "notice"-not a replacement for the first two, doesn't relay

hazard level, but is used to convey policies of the facility to protect persons and property

*according to 4.7.3.3, for signs outside a temporary laser area

ie: during periods of service

*4.7 dictates design of signs, but 4.3.10.2 and 4.3.11.1 say where to post

*where to post is also summarized in table 11

4.7.4 Sign information and Warnings p50

4.7.4.1-Signal word(danger, caution, notice) goes in upper panel

4.7.4.2

Signs should have space for following info(whether printed or handwritten):

a) Relevant protective instructions and actions should begin above the tail of sunburst(position 1)

ex: laser eyewear required, knock before entering, Invisible laser Radiation

*class based guidelines in 4.7.5(1) a-e can also go in position 1

b)The type of laser or, wavelength, pulse duration or max input should go below the tail(position 2)

c)class of laser/system should go in position 3(we don't know where that is, guess is near the top of text)

4.7.4.3 and 4.7.5.1

signs should be conspicuously located/displayed where onlookers will be best warned

4.7.5 p51 Equipment Label Requirements

(1) position 1 can also hold:

"Laser Radiation - Do Not Stare into Beam"-Class 2 laser/systems

"Laser radiation - Do Not Stare into Beam or View Directly w/Optical Instruments"-Class 2M and applicable Class 3R

"Laser Radiation - Avoid Direct Eye Exposure"-Class 3R

"Laser Radiation - Avoid Direct Exposure to Beam"-Class 3B

"Laser Radiation - Avoid Eye or Skin Exposure to Direct or Scattered Radiation

(2) and (3) repeat what is in 4.7.4.2

*position 1 standards can be satisfied by FLPPS(Federal Laser Product Performance Standard or IEC 60825-1 or latest revision

4.7.6

any signs that comply with a previous standard is considered in compliance of this standard

Oztek Re-Alignment Procedure, Notes, and Reference

Dept	Product Introduction
Created	10/20/2021
Revised	02/24/2022
Recorder	Assata Acey

Primary Procedure

1. Loosen, but do not remove, the eight screws that secure the fan assembly to the base plate and cover.
2. Remove the warranty void stickers on either side, exposing two of the ten side screws.
3. Loosen, but do not remove, the screws that were just uncovered along with the other screws on sides of the top cover fan assembly (a total of ten screws). There are six on one side and four on the other.
4. With those screws relaxed, try to apply the necessary pressure to the cover (likely downward) such that the mounting ears can be secured without struggle using the supplied screws to the specified torque of 16 in-lb. If alignment difficulty persists, continue to step 4. If not, skip to step 9.
6. Loosen, but do not remove, the eight screws that secure the front panel assembly to the base plate and cover.
7. Try again to shift the cover so as to align and secure the mounting ears to the intended locations at 16 in-lb using the supplied screws.
8. If unsuccessful, then this unit must return to Oztek under RMA.
9. If successful, with the mounting ears now installed, tighten all the top cover side screws to 16 in-lb.
10. Tighten all the front panel and fan assembly screws to 22 in-lb.
11. Notify Oztek of the serial number of the unit such that we can record in our serial number archives that we have authorized you to do so.

Procedure Notes:

- A. After consulting with Seth, neither one of us could identify an additional 4 screws beyond the ten that were mentioned. As such, I truncated the original step 5:**

5. Loosen, but do not remove, the remaining four screws along the sides of the top cover (there are two left per side).

- B. An alternate interpretation of the inconsistency would create the following procedure:**

1. Loosen, but do not remove, the eight screws that secure the fan assembly to the base plate and cover.
2. Remove the warranty void stickers on either side, exposing two of the ten side screws.
3. Loosen, but do not remove, the screws on left and right sides of the top cover fan assembly. Leave out the two closest to the front on each side for a total of 6 screws loosened (out of the ten total counting each side).
4. With those screws relaxed, try to apply the necessary pressure to the cover (likely downward) such that the mounting ears can be secured without struggle using the supplied screws to the specified torque of 16 in-lb. If alignment difficulty persists, continue to step 4. If not, skip to step 9.
5. Loosen, but do not remove, the remaining four screws along the sides of the top cover
6. Loosen, but do not remove, the eight screws that secure the front panel assembly to the base plate and cover.
7. Try again to shift the cover so as to align and secure the mounting ears to the intended locations at 16 in-lb using the supplied screws.
8. If unsuccessful, then this unit must return to Oztek under RMA.
9. If successful, with the mounting ears now installed, tighten all the top cover side screws to 16 in-lb.
10. Tighten all the front panel and fan assembly screws to 22 in-lb.
11. Notify Oztek of the serial number of the unit such that we can record in our serial number archives that we have authorized you to do so.

Reference information

For supplies already in your possession which are undamaged, but suffering from this misalignment problem, we may be able to guide your personnel through adjustment in such a manner as to avoid the shipping headache and not compromise the warranty. If you are interested, here is what we would propose:

1. Loosen, but do not remove, the eight screws that secure the fan assembly to the base plate and cover.
2. Loosen, but do not remove, the ten screws along the sides of the top cover nearest to the fan assembly. There are six on one side and four on the other.
3. With those screws relaxed, try to apply the necessary pressure to the cover (likely downward) such that the mounting ears can be secured without struggle using the supplied screws to the specified torque of 16 in-lb. If alignment difficulty persists, continue to step 4. If not, skip to step 9.
4. Remove the warranty void sticker, notifying Oztek of the serial number of the unit such that we can record in our serial number archives that we have authorized you to do so.
5. Loosen, but do not remove, the remaining four screws along the sides of the top cover. There are two left per side.
6. Loosen, but do not remove, the eight screws that secure the front panel assembly to the base plate and cover.
7. Try again to shift the cover so as to align and secure the mounting ears to the intended locations at 16 in-lb using the supplied screws.
8. If unsuccessful, then this unit must return to Oztek under RMA.
9. If successful, with the mounting ears now installed, tighten all the top cover side screws to 16 in-lb.
10. Tighten all the front panel and fan assembly screws to 22 in-lb.

Figure 1. John Moisan, Quality Manager (Oztek) Aug 30, 2021

Jira is Big. Purpose of These notes is to explain use--and possibilities for use-- to organize and communicate team priorities

Task levels/Board Types

1. Boards are for Projects, Not Team??
2. Teams can be attached to Project Boards which display epics, issues, and child issues in priority order, based on status, and filtered at the viewers discretion
3. You can change the name of a item type on a board.(ie, child task and applicable fields can be changed to "subtask")
4. Theres alot of boards, but right now I'm reccomending Kanban
5. When an accident occurs, you can change a subtask to a parent task.

General viewing

1. Whatever Key you put in for Project Type will become the label number for each subtask
2. Can change board view to group by assignee, epic, etc
3. Grouping by subtask will allow subtask//child issues to be seen in the board as well
4. Once a task has been assigned to someone, their Jira picture will appear in the bottom
5. right corner of the task "card"

Epics

1. You have to go to the "Roadmap" to creat an Epic
2. If you click the down arrow by Epic(below board name, left of board memeber pictures), you can select or deselect which projects you want to look at right now
3. Roadmaps can also show, given the timing of each related task, what the timeline is for an epic

Issues

1. If you hover over the issue tree, it will tell you how many childtask/how many have been completed
2. If you click on an issue, you can assign an epic, add comments, or even creat a child task
3. you can set up constraints, contingences, relationships between issues
4. You can link child tasks together, but they may not automatically show up in search bar; you'll have to type a good chunk of its name to select it

Interactions

1. May aslo suffice to import issues from ther projects into Team Jira board as an Epic or parent issue

Notes:

- 1 At some point may have to go in and sort existing itms in current board
- 2 Reccomending Names chart doc to help folks see which names mean the sam thing from Teamworks name to different terms in Jira for Navigability

PTE 88 (04/09/2024 D. Hackman Dep. pp.

110(116)-116(1114))

6 Do you recall anything about a UV
7 project?

8 MR. LONGO: Objection. Form.

9 THE WITNESS: Can you state that
10 again?

11 BY MS. ACEY:

12 Q. Do you recall anything about a "UV
13 project"?

14 A. Yes.

15 MR. LONGO: Same objection.

16 THE WITNESS: Yes.

17 BY MS. ACEY:

18 Q. Were you involved in this project?

19 A. Informally, yes.

20 Q. Did this project involve calculations?

21 A. Yes.

22 Q. Who completed those calculations?

23 A. You did.

24 Q. Did you ever present calculations --

DANIEL HACKMAN

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1 I'm sorry.

2 I want to go back.

3 Do you know who assigned those
4 calculations to me?

5 MR. LONGO: Objection. Form. Beyond
6 the scope of direct examination.

7 THE WITNESS: I think it was either --
8 I think it was either -- I -- I don't know.
9 I think it was probably is Joren Wendshuh or
10 Jerry Frank.

11 BY MS. ACEY:

12 Q. Did you present any calculations to
13 Mr. Wendshuh?

14 A. No.

15 Q. For the record, Mr. Hackman, have you
16 been asked during this deposition to testify to
17 the scope my work with InductEV?

18 A. No, I don't think so.

19 Q. Have you been asked during this
20 deposition about my impressions of whether my work
21 was appropriate for my role at InductEV?

22 A. Okay.

23 Q. Did you produce any documentation for
24 that project?

1 A. No.

2 Q. To your knowledge, who was in charge
3 of the project?

4 A. I believe -- I believe you were the
5 one tasked with it, which, I guess, would put you
6 in charge.

7 If you're asking who gave you the
8 directive to work on it, it would be either Joren
9 or -- it was probably Joren. I believe Jerry
10 Frank had a little bit of involvement or interest
11 in it, but you didn't report to him. You reported
12 to Joren.

13 Q. Do you recall earlier in this
14 deposition being asked to look at Interrogatories
15 submitted from myself to the defendant?

16 A. Yes.

17 Q. Can you recall what was written in
18 reference to you on those Interrogatories?

19 A. Something about Sam Gallagher and
20 sexual harassment and the -- the nature of the
21 work, and I think there was something else, but I
22 don't recall.

23 Q. Were you asked to interpret what was
24 meant by the term "nature of the work" --

DANIEL HACKMAN

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1 A. I don't recall --

2 Q. -- as you --

3 A. -- I don't recall if I was asked to or
4 if I offered that, but I think I made a comment
5 about that, yes.

6 Q. Okay. Were you aware of any materials
7 being purchased for their UV project?

8 MR. LONGO: Objection. Form. Beyond
9 the scope.

10 THE WITNESS: I -- I am aware of it,
11 yes.

12 BY MS. ACEY:

13 Q. Who sourced those materials?

14 A. You did.

15 Q. Were you aware of any technicians
16 undertaking similar projects?

17 A. No.

18 Q. Can you describe the liability of the
19 calculations done in the UV project?

20 MR. LONGO: Objection. Form. Beyond
21 the scope.

22 THE WITNESS: Yes. There was a--
23 there could have been grave consequence to
24 health and safety had that work not been done

1 or not been done well. Mostly with respect
2 to eye safety.

3 BY MS. ACEY:

4 Q. Can you go into further detail?

5 What -- what -- what would be the
6 danger?

7 A. So --

8 Q. Yeah.

9 A. I -- I recall that the project related
10 to high power laser -- high power UV diodes that
11 offered significant health and safety risks.
12 Because -- because of the intensity of the lights,
13 any speculative reflection from that source that
14 reaches somebody's eye could cause permanent
15 damage or blindness. And so understanding the --
16 understanding what is required to ameliorate that
17 risk, I believe, was largely the scope of work
18 that you did in proposing appropriate personal
19 protective equipment.

20 Q. Were you aware of anyone else at
21 InductEV who would be comfortable completing those
22 calculations?

23 A. I would. An engineer. An engineer.
24 An optomechanical engineer or an electrical

DANIEL HACKMAN

Page 115

1 engineer would probably be comfortable doing that.

2 Q. Did InductEV have an optomechanical
3 engineer?

4 A. No.

5 Q. Were you aware of any educational or
6 experience qualifications that I would have for
7 completing those calculations?

8 A. I'm sorry. Can you restate the
9 question?

10 Q. Were you aware of any educational or
11 experience qualifications that I would have --

12 A. Yes.

13 Q. -- for completing those calculations?

14 A. Yes.

15 MR. LONGO: Objection. Form. Beyond
16 the scope of direct.

17 THE WITNESS: You acquired a Bachelor
18 of Science in Physics and worked in -- worked
19 with a professor -- you did research in
20 optics and lasers.

21 BY MS. ACEY:

22 Q. Were you aware of anyone else at the
23 company who did research or had experience in
24 optics or lasers, as you put it?

1 MR. LONGO: Objection.

2 THE WITNESS: I have some experience
3 in optics and lasers, but other than that,
4 no.

5 BY MS. ACEY:

6 Q. Okay. So to clarify, you said you
7 were the only other person that you were aware of?

8 A. Yes.

9 Q. Okay. Did you testify earlier that --
10 actually, I'm sorry.

11 Were you aware of any technicians
12 doing similar projects?

13 MR. LONGO: Objection. Form.

14 THE WITNESS: No. The answer the no.



PTE 89 (02/04/2022 Teams Messages between myself and my Supervisor, Doc 40 Transcript (II)(22), *originals filed in Doc 40-2 pp. 570-571*).

22. **02/04/2022 Recorded recollection from myself to my supervisor of a discussion I had the previous Tuesday with my supervisor about the feasibility of the current workplace culture, and my personal goals (Ex. 284). References: ECF 8-1(¶120-122), Doc 15 (¶77).**

2:10:42 PM Assata: Message from Tuesday: Hey, erm idk how or whether to say this but I think I may be irreparably unhappy with work as it currently exists

There's a lot of things I enjoy about work and moments where I feel happy here; wonder if a remedy is needed at all.

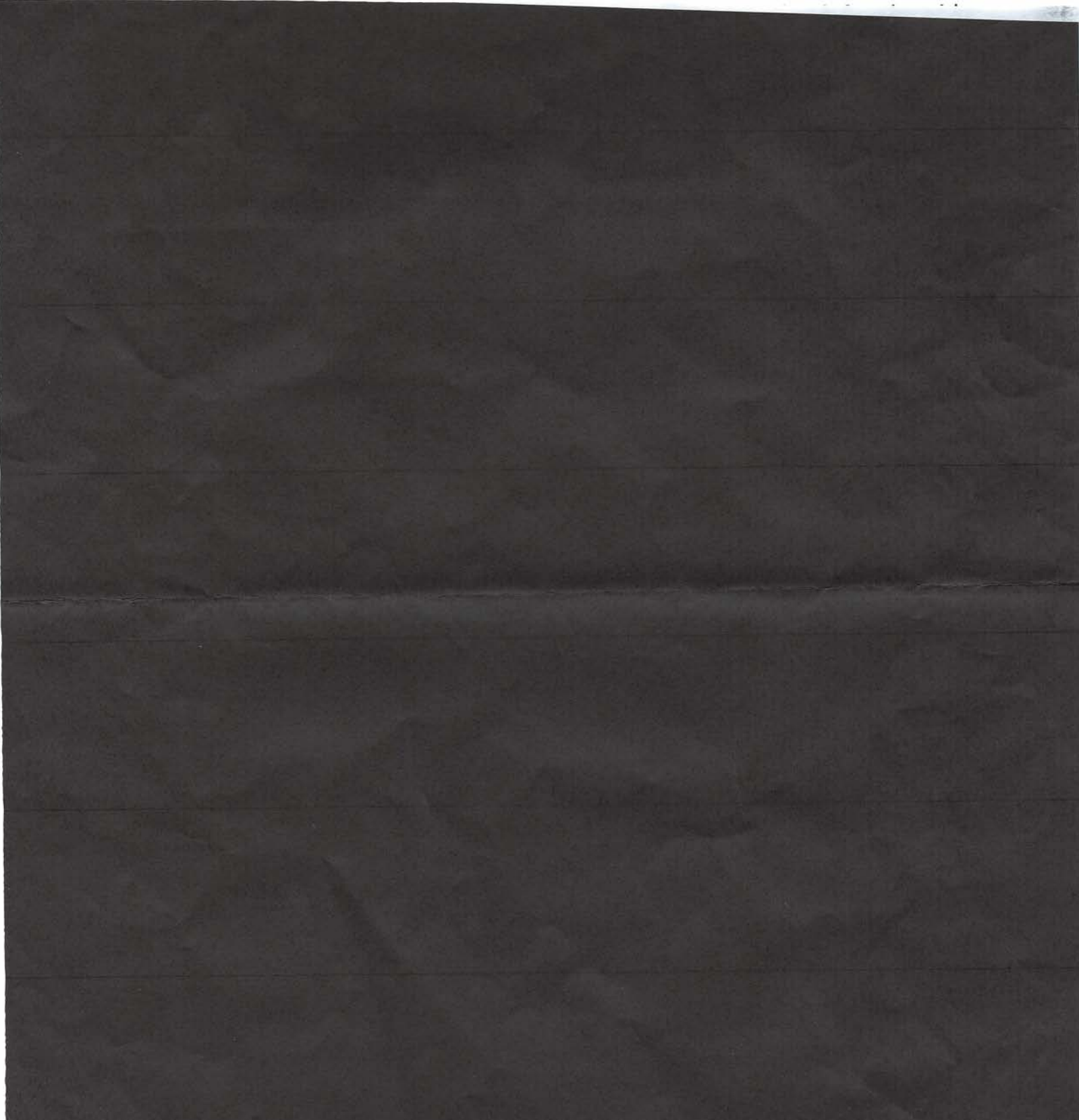
However I have decidedly shifted from(how or whether to try) to get more happiness out of work to making room for the other goals/life aspects(house education, personal care) that make me happy.

For that major purpose, I think working part time or on a 3day wfh 2day in-house schedule would be best for me.

Anticipated benefits are: 1.cut down opportunities for stressful interactions with others

2. Grant me more time and flexibility to wrap up crucial home repairs
3. grant me more time and flexibility to shift back towards my masters degrees
4. Grant me more flexibility to schedule and do my best work I consistent and not stressful environment vs being distracted by emotions, settings

I totally get if there s not role for that in the team etc bit I also have considered this and wanted to at least let you know where I stand.



**PTE 90 (03/10/2022 Teams meeting Scheduled
between myself and my Supervisor).**

Formalizing **Job** Structure/Requirements



Assata Acey

Required Joren Wendschuh

✓ Accept ▾

? Tentative ▾

✕ Decline ▾

🕒 Propose New Time ▾



Thu 3/3/2022 3:12 PM

🕒 Thursday, March 10, 2022 12:30 PM-1:30 PM Preferably Teams.

1. Review Documentation/Definition needs to formalize role
2. Review scope of work/Reasonable Outcomes of each focus area
3. Discuss as necessary to draft Documentation

Microsoft Teams meeting

Join on your computer or mobile app

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**PTE 91 (02/2022-04/2022 Emails between
myself and my Supervisor).**

FW: 2022 work plan notes



Assata Acey Assata.Acey@momentumdynamics.com [via](#) mtmd... Sun, 27 Mar 2022, 21:54

Assata Acey | Technician
484-320-8222 ext 178



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From: Assata Acey
Sent: Sunday, March 27, 2022 9:51 PM
To: Joren Wendschuh <joren.wendschuh@momentumdynamics.com>
Subject: RE: 2022 work plan notes

Alrighty, I revisited this , boiled stuff into concise wording and meditatively tweaked it towards tasks I enjoy and feel confidence and excitement towards doing. I think there may be additional untyped benefits to some competencies (ie: dept information can also inform improvement of documentation), but I tried to focus on the emphasis of each additional task, as documentation review is a task each tech is involved in.(it also seemed to clutter the document) Let me know what you think!

From: Assata Acey
Sent: Wednesday, February 9, 2022 4:40 PM
To: Joren Wendschuh <joren.wendschuh@momentumdynamics.com>
Subject: 2022 work plan notes

Assata Acey | Technician
Momentum Dynamics Corporation
[Fueling the Future of Electric Transportation](#)
3 Pennsylvania Ave, Malvern, PA 19355

2 attachments • Scanned by Gmail



Assata Acey Assata.Acey@momentumdynamics.com [via](#) mtm... Wed, 20 Apr 2022, 12:05

Assata Acey | Technician
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From: Assata Acey
Sent: Wednesday, April 20, 2022 12:05 PM
To: Joren Wendschuh <joren.wendschuh@momentumdynamics.com>
Subject: RE: 2022 work plan notes

Beh humbug

From: Assata Acey
Sent: Friday, April 15, 2022 4:44 PM
To: Joren Wendschuh <joren.wendschuh@momentumdynamics.com>
Subject: RE: 2022 work plan notes

Revised document attached


From: Assata Acey <Assata.Acey@momentumdynamics.com>
Sent: Wednesday, April 13, 2022 3:39 PM
To: Assata Acey <Assata.Acey@momentumdynamics.com>
Subject: Re: 2022 work plan notes

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Assata Acey <aceyassata@gmail.com>

to Daniel 



Wed, 20 Apr 2022, 12:09



I sent this to Joren as a response to his questions. I somewhat feel like a life trajectory is personal and shouldn't be required to be compensated for work. (he almost tried to talk me out of my masters degree today ionlikethat) or to discuss viable job options if a company as is.

----- Forwarded message -----

From: Assata Acey <Assata.Acey@momentumdynamics.com>
Date: Wednesday, 20 April 2022
Subject: FW: 2022 work plan notes
To: Assata Acey <aceyassata@gmail.com>

Assata Acey | Technician
484-320-8222 ext 178

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PTE 92 (04/18/2024 A. Acey Dep p. 171 (ll7-16)).

7 Q. "I think I'm gonna go in for my
8 meeting and update my resume to send to Joren
9 while at work."

10 What's that about?

11 A. I mean, it's a continuation.
12 We'd been talking about this job title and
13 looking at this job title. The discussions
14 about the job opening and title, description
15 did not conclude when I had complained about
16 disability or anything else, so --

17 Q. Well, let's go to the top of
18 the next page, Ms. Acey.

**PTE 93 (04/11/2024 A. Acey Dep. p.
151(1115)-153(1119)).**

15 BY MR. SCHAUER:

16 Q. Did anyone ever tell you that you
17 were not going to be able to -- I know it
18 didn't happen as -- as you wanted it to, but
19 did anyone ever tell you that you would never
20 be anything other than a technician at
21 InductEV?

22 A. Omar told me that I would never
23 make what the other employees were making.

24 Q. Did Omar -- is Omar your boss?

1 A. No.

2 Q. Is Joren your boss?

3 A. Yes.

4 Q. Was Omar involved in decisions
5 relative to promotions at InductEV?

6 A. Not my promotion, no.

7 Q. Right. Sure.

8 You talked to Joren about career
9 path, didn't you?

10 A. I did.

11 Q. Okay. Did he ever tell you that
12 there's no way he would make a black woman
13 other anything other than a technician here?

14 A. No.

15 Q. In fact, he was encouraging, wasn't
16 he?

17 A. Yeah.

18 Q. He was, right?

19 Did Ms. Talis ever tell you,
20 there's no way that -- you know, you're ever
21 going to be allowed to be anything, did she
22 tell you the explicitly that there's no way
23 that you're going to ever have a position at
24 InductEV other than as a technician?

1 A. Joren said there was a process
2 engineer role. He asked me to write a job
3 description. I submitted it. We met over it
4 several times, and three months after that,
5 even to the point of my disability, it was
6 never pushed further.

7 He kept saying there was something
8 wrong with the description. I need to add
9 more duties. And I could not understand if
10 he was saying that I could be promoted,
11 especially since I disclosed to him that I
12 was interested in just stepping away from the
13 company altogether. I couldn't understand
14 those statements.

15 Q. So you couldn't understand Joren's
16 explanation to you of --

17 A. But his actions.

18 Q. -- the delay?

19 A. Yes.



PTE 94 (04/08/2022 Teams Messages between myself and my Supervisor, Doc 40 Transcript (IV)(3)(7:45 AM-8:02 AM), *originals filed in Doc 40-2 pp. 1241-1248*).

3. 04/08/2022 Present sense impression from myself to my supervisor about continuing in-person duties, the progression of my illness, and dissatisfaction with the misclassification of my role (Ex. 603-622). References: Ex.859-860, ECF 8-1(¶3, ¶6, ¶32-37, ¶44, ¶136-164), Doc 15 (¶82-84), ECF 15-59-ECF 15-63, Doc 20 (¶8-49).

6:12:18 AM Joren: Are you okay?

6:17:43 AM Assata: Yep

6:25:46 AM Joren: Lol. Too late.

6:36:32 AM Assata: Rip

6:36:37 AM Assata: Ruined sleep for everyone

7:05:14 AM Assata: Can you follow up with Harry about that extra amount I never received?

7:05:22 AM Assata: Follow up with Harry

7:05:30 AM Joren: I can...

7:05:57 AM Assata: Be I'd be asking twice

7:06:19 AM Joren: I can. Would you want me to?

7:45:40 AM Assata: Good article that also highlights the importance of formalized roles

https://www.huffpost.com/entry/invisible-work-women-office n 624c4effe4b0d8266ab18824?utm_source=Sailthru&utm_medium=email&utm_campaign=Momingfl&7-22&utm_term=us-morning-email

7:58:59 AM Joren: Hm ok please email

8:00:55 AM Assata: Email?

8:02:16 AM Joren: Yes.

8:02:35 AM Assata: What am I emailing. If it's Harry I'd rather go without

8:02:48 AM Joren: The link...

8:03:20 AM Assata: But also joren I am very dizzy and my legs are folding when I walk. I'm going to try to take a nap(in my car) and then head to our meeting. If I didn't feel better I'll probably go home and do online work there (set me cabinet goal for wed)

8:03:38 AM Joren: Uh. Yeah. Go home.

**PTE 95a (04-20-2022 Emails between myself,
my Supervisor, and D. Hackman).**



Assata Acey <aceyassata@gmail.com>

20 Apr 2022, 12:09



to Daniel

I sent this to Joren as a response to his questions. I somewhat feel like a life trajectory is personal and shouldn't be required to be compensated for work. (he almost tried to talk me out of my masters degree today ionlikethat) or to discuss viable job options ik a company as is.

----- Forwarded message -----

From: **Assata Acey** <Assata.Acey@momentumdynamics.com>

Date: Wednesday, 20 April 2022

Subject: FW: 2022 work plan notes

To: Assata Acey <aceyassata@gmail.com>

Assata Acey | Technician

484-320-8222 ext 178



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2 attachments • Scanned by Gmail



Assata Acey <aceyassata@gmail.com>

20 Apr 2022, 12:11



to Daniel

This was the JD

One attachment • Scanned by Gmail



PTE 95b (04/2022 Supervisor feedback).



Assata Acey Assata.Acey@momentumdynamics.com [via](#) mtmdyn.on... 9 May 2022, 00:18
to me



One attachment • Scanned by Gmail



Assata Acey Assata.Acey@momentumdynamics.com [via](#) mtmdyn.on... 9 May 2022, 00:19
to me



One attachment • Scanned by Gmail



Assata Acey Assata.Acey@momentumdynamics.com [via](#) mtmdyn.onmicr... 9 May 2022, 00:21
to me



Assata Acey | Technician
484-320-8222 ext 178



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From: Assata Acey <Assata.Acey@momentumdynamics.com>
Sent: Monday, April 4, 2022 12:04 PM
To: Joren Wendschuh <joren.wendschuh@momentumdynamics.com>
Subject: Re: 2022 work plan notes

Documenting what we know as a dept, tips and methods tech use in assemblies that aren't in conflict with assembly steps etc--can also be used to improve the assembly docum3nts.

Get [Outlook for Android](#)

From: Joren Wendschuh <joren.wendschuh@momentumdynamics.com>
Sent: Monday, April 4, 2022 11:30:19 AM
To: Assata Acey <Assata.Acey@momentumdynamics.com>
Subject: Re: 2022 work plan notes

Assata,

Thank you for doing this! Well done. Glad to hear you modified it to have excitement. That was the intent!

Please help me understand:

I think there may be additional untyped benefits to some competencies (ie: dept information can also inform improvement of documentation), but I tried to focus on the emphasis of each additional task, as documentation review is a task each tech is involved in.(it also seemed to clutter the document)

Joren Wendschuh | Manager, Product Introduction

484-320-8222 ext 143



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From: Assata Acey <Assata.Acey@momentumdynamics.com>

Sent: Sunday, March 27, 2022 21:50

To: Joren Wendschuh <joren.wendschuh@momentumdynamics.com>

Subject: RE: 2022 work plan notes

Alrighty, I revisited this , boiled stuff into concise wording and meditatively tweaked it towards tasks I enjoy and feel confidence and excitement towards doing. I think there may be additional untyped benefits to some competencies (ie: dept information can also inform improvement of documentation), but I tried to focus on the emphasis of each additional task, as documentation review is a task each tech is involved in.(it also seemed to clutter the document)

Let me know what you think!

Assata Acey | Technician

484-320-8222 ext 178



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Jaguar I-Pace with ...



Assata Acey Assata.Acey@momentumdynamics.com [via](#) mtmdyn.on... 9 May 2022, 00:21

to me



**PTE 96 (08/03/2022 Notice of Charge AND
08/15/2022 JIRA Notification)**

From: [Joren Wendschuh \(Jira\)](#)
To: [Assata Acey](#)
Subject: [JIRA] (project) (GA2CE) Project moved to trash
Date: Monday, August 15, 2022 11:59:28 AM
Attachments: [jira-generated-image-static-footer-desktop-logo-531d1a6c-d2b4-4fb2-ad51-2fc3352db192](#)

EXTERNAL EMAIL

Joren Wendschuh moved this project to trash on 15/08/2022 15:59:20 .

The project, including all its issues, components, attachments, and versions will be available in the [trash](#) for 60 days after which it will be permanently deleted.

Only Jira admins can restore the project.

project

Get Jira notifications on your phone! Download the Jira Cloud app for [Android](#) or [iOS](#)

This message was sent by Atlassian Jira (v1001.0.0-SNAPSHOT#100204-sha1:948b370)



**PTE 97 (04/28/2021 Interview Evaluations
from both Supervisor and CAO, ECF 20-5,
ECF 20-7)**



Interview Evaluation Form

Candidate Name: Assata Acey

Interviewer: Joren Wendschuh

Position: Sr Tech

Date: 4-28

-
- 1.) **Culture Fit:** Candidate's beliefs and behaviors align with the company's core values and company culture.

Rate the candidate on a 1-5 scale (1 = not a fit; 5 = perfect culture fit)

1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☒

Please comment on the reason for your rating:

Loves to learn and explore and do research. Interested in everything!
Passionate about science and trying things.

- 2.) **Skill/Competency Fit:** Do the skills the candidate will bring to the job align with the job competencies?

Rate the candidate on a 1-5 scale (1 = not a fit; 5 = perfect skillset)

1 ☐ 2 ☒ 3 ☐ 4 ☐ 5 ☐

Please comment on the reason for your rating:

I think Assata is a bit of a unique person for this role, and I would look to more as a technician ("title") coming on board, unless Omar & Seth are Sr's.
Brings a unique "science and engineering" background and knowledge to the job - would expect to be doing some borderline engineering work, while learning some of the "Sr" tech side of things at least in our niche.

- 3.) **Technical Fit:** Does this candidate have the technical aptitude needed to succeed in this position?

Rate the candidate on a 1-5 scale (1 = not a fit; 5 = perfect technical fit)

1 ☐ 2 ☐ 3 ☐ 4 ☒ 5 ☐

Please comment on the reason for your rating:

**Aptitude yes - willing and interested from what I can see in an interview.
Excited about work and wanting to overcome.**

- 4.) **Overall Fit:** Average your ratings and please select yes or no on moving forward with this candidate.

Average Rating: 3.5

Yes ☒ No ☐

Overall Comments:

**Looking to move forward pending interview debrief and others thoughts.
That is, move forward to an in person "shadow" / meet / greet / on site
"interview".**



Interview Evaluation Form

Candidate Name: Assata Acey

Interviewer: Judy Talis

Position: Senior Technician

Date: 4/28/2021

- 1.) **Culture Fit:** Candidate's beliefs and behaviors align with the company's core values and company culture.

Rate the candidate on a 1-5 scale (1 = not a fit; 5 = perfect culture fit)

1 ☐ 2 ☐ 3 ☐ 4 ☒ 5 ☐

Please comment on the reason for your rating:

Candidate has a very innovative take on her work. She has always looked beyond the task and thinks out of the box. It is in her nature. She gave several examples of schooling where she would be given an assignment and she would complete it but then go beyond that initial assignment and look at it from different angles. She thinks MD is somewhere that can be valued. Having said that she understands the need to do her job as asked as well.

- 2.) **Skill/Competency Fit:** Do the skills the candidate will bring to the job align with the job competencies?

Rate the candidate on a 1-5 scale (1 = not a fit; 5 = perfect skillset)

1 ☐ 2 ☐ 3 ☐ 4 ☒ 5 ☐

Please comment on the reason for your rating:

While she may not have the exact skills we are looking for she is certainly capable with her background on learning them. She mentioned when the interview team asked her about her use of tools, she made a joke she didn't think they understood, but she has a strong grasp of the tools of the trade. In her job at comcast she got one day of training shadowing someone and then was left to do the job including writing of results of testing she was doing. Seems capable.

- 3.) **Technical Fit:** Does this candidate have the technical aptitude needed to succeed in this position?

Rate the candidate on a 1-5 scale (1 = not a fit; 5 = perfect technical fit)

1 ☐ 2 ☐ 3 ☒ 4 ☐ 5 ☐

Please comment on the reason for your rating:

- 4.) **Overall Fit:** Average your ratings and please select yes or no on moving forward with this candidate.

Average Rating: 4.0

Yes ☒ No ☐

Overall Comments:

Assata is an out of box thinker. I of course addressed the fact that she has an engineering degree and did she see this technician role as a way to get into the company. She feels the technician role is fundamental to engineering. The lines can be blurry for an entry level engineering and the hands on components will make her a better engineer. She enjoys the job. She would eventually like to

**PTE 98 (03/18/2024 Defendant's Answers
(ll144-145); 03/28/2024 P. Rensel Dep. p. 10;
04/08/2024 M. Tabbut Dep. p. 25; Various
Employee Profiles).**

144. Despite this, I was not among the four employees reclassified between 12/20/2022 and 03/20/2022, with attention to company needs, and preexisting qualifications, and job tasks: Diana Wilmes (White, female), Taylor Johnson (White, male), Harry Nask (White, male), and Andrea Neff (White, female).

ANSWER: Denied. Defendant specifically denies that Plaintiff was qualified for reclassification. By way of further response, Defendant specifically denies that the decision not to reclassify Plaintiff was due to race or sex.

145. Within 4 years before and sometime after my employment, Bill Gallagher (White, male) was reclassified from his role of Principal Electrical Engineer to Principal Test Engineer,

and Senior Technician, Rob Rosenberger (White, male) reclassified from Product Introduction to the Testing Team and Daniel Schwartz (White male) was promoted to vice president of Supply Chain.

ANSWER: Admitted.



1 BY MS. ACEY:

2 Q. What was your role at Induct EV?

3 A. Could you put a timeframe to that
4 question?

5 Q. What was your initial role at Induct
6 EV?

7 A. HR Director.

8 Q. What was your final role at Induct EV?

9 A. I don't recall my title when I left.

10 Q. DO YOU recall any changes to your
11 title?

12 A. There were changes to my title.

13 Q. Which changes do you recall?

14 A. I was hired as the HR Director. My
15 title changed a few times.

16 Q. What did your title change to?

17 A. I honestly don't recall. I --

18 Q. Would you describe -- oh, I'm sorry.

19 A. I am trying to remember. I had several
20 titles while I was there; I don't recall.

21 Q. Would you normally describe yourself --
22 just, actually, before I ask this question, I
23 just want to be clear that it is meant
24 objectively, and not necessarily to be

1 A. Yeah, so for this company, we had
2 electrical cabinets that took the power from your
3 grid, basically, and then converted it to allow it
4 to charge to our coil. So, basically, a big
5 electrical cabinet you might see on the side of
6 the road by traffic lights, that kind of thing.
7 And, yeah, just all the big metal box that holds a
8 bunch of electrical components in it.

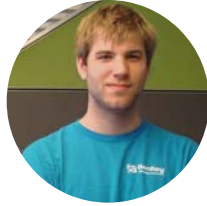
9 Q. Did you ever hold any other roles
10 at InductEV besides mechanical engineer?

11 A. Basically, mechanical engineer has
12 been my role since then, full time.

13 Q. When you joined as a mechanical
14 engineer, were you, like, an introductory level
15 engineer or did your role kind of stay the same
16 throughout the entirety of your time?

17 A. Yeah, role moved up as the years
18 went on to senior mechanical engineer, just kind
19 of gained more job roles in those, as I moved up.
20 Because, yeah, I was pretty junior. My title
21 wasn't junior mechanical engineer, but it was
22 mechanical engineer from the start and moved up to
23 senior, I think, about four, five years in.

24 Q. With respect to mechanical
25 engineering, is there any type of licensure that's



Kyle Abramowitz · 2nd
Embedded Software Engineering



- MachineQ, a Comcast Company



- Drexel University

Philadelphia, Pennsylvania, United States · [Contact info](#)

398 connections



Maria Tabbut, Ryan Taggart, and 11 other mutual connections

Message

 Connect

More

Highlights



You both worked at InductEV

You both worked at InductEV in June 2021

 Message

About

Motivated to make the world a better place through intelligent use of technology while learning as much as I can in the process.

Activity

401 followers

Kyle hasn't posted yet

Recent posts Kyle shares will be displayed here.

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Experience



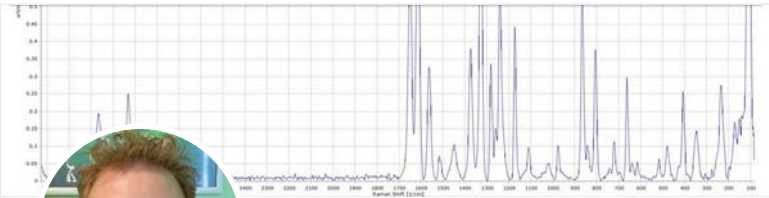
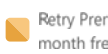
IOT Architect II

MachineQ, a Comcast Company · Contract

Mar 2023 - Present · 1 yr 7 mos

Philadelphia, Pennsylvania, United States

 Bluetooth Low Energy, Go (Programming Language) and +4 skills



Dan Hackman · 2nd
Senior Electrical Engineer at MOBILion Systems



• MOBILion Systems, Inc.



• Penn State University

United States · [Contact info](#)

46 connections



[Maria Tabbut](#), [Joren Wendschuh](#), and 6 other mutual connections

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Highlights



You both worked at InductEV
You both worked at InductEV from June 2021 to September 2022

[Message](#)

About

I love to experiment with concepts at the intersections of the sciences (Energy, Optics, Circuitry, Chemistry Programming).

Activity

47 followers

Dan hasn't posted yet
Recent posts Dan shares will be displayed here.

[Show all activity →](#)

Experience



Senior Electrical Engineer
MOBILion Systems, Inc. · Full-time
Apr 2023 - Present · 1 yr 6 mos
Chadds Ford, Pennsylvania, United States · On-site



InductEV
9 yrs 10 mos
Principal Electrical Engineer

Full-time

Jan 2018 - Mar 2023 · 5 yrs 3 mos

- Delivered and polished various project milestones by generating product designs, design reviews, documentation, test ...

💡 Prototyping, Electro-mechanical Troubleshooting and +18 skills

Project Engineer

Jun 2013 - Jan 2018 · 4 yrs 8 mos

- Momentum Dynamics Corporation is now known as InductEV
- Devised designs for wireless charger prototypes in collaboration with...

💡 Prototyping, Electro-mechanical Troubleshooting and +12 skills

**Electrical Engineer**

InductEV

Jun 2011 - Jan 2013 · 1 yr 8 mos

- 1st employee of the company.
- Worked under guidance of chief scientist and late co-founder (Bruce...

💡 Prototyping, Electro-mechanical Troubleshooting and +10 skills

Education**Penn State University**

Bachelor of Science - BS, Engineering Science and Mechanics

Received: B.S. Engineering Science and Mechanics with Concentration in Semiconductors...

💡 Computer-Aided Design (CAD) and Chemistry

Projects**Computer Design**

- Custom 8-bit microprogrammed TTL computer with custom CPU and custom instruction set architecture...

💡 Computer-Aided Design (CAD), Research and +3 skills

Light Microscope

- Diffraction-limited Light microscope capable of brightfield, darkfield, polarized light, DIC, phase contrast and fluorescence microscopy...

💡 Research, Supplier Sourcing and +4 skills

Show all 5 projects →

Skills**SOP Authoring**

2 experiences at InductEV

FLIR

3 experiences at InductEV

Show all 23 skills →

Recommendations

**InductEV**

Full-time · 8 yrs 3 mos
On-site

Engineering Architect

Jan 2023 - Present · 1 yr 9 mos
King of Prussia, Pennsylvania, United States

Principal Power Electronics Engineer

Sep 2017 - Jan 2023 · 5 yrs 5 mos
Malvern, Pennsylvania, United States

Senior Power Electronics Engineer

Jul 2016 - Aug 2017 · 1 yr 2 mos
Malvern, Pennsylvania, United States

**Princeton Power Systems**

3 yrs 4 mos

Senior Engineer - Mechanical Group Manager

Jul 2014 - Jun 2016 · 2 yrs
Lawrenceville, NJ

Principle Engineer for DRI-10, GTIB-30 and bi-directional charging station (CA30/CA15/CA10) product lines. Lead development for product lines in...

Electrical Engineer

Apr 2013 - Jun 2014 · 1 yr 3 mos
Lawrenceville, NJ

As a member of the Engineering Team at Princeton Power Systems I assist in both electrical and mechanical design for various projects. I am the Produc...

Engineering Consultant

Mar 2013 - Mar 2013 · 1 mo

Work remotely with a project team to assist in the completion of key circuit boards.

**Junior Engineer**

Souriau
May 2010 - Jan 2013 · 2 yrs 9 mos
York, Pennsylvania

Developed Integrated PCB Designs for Cable Assemblies
Mechanical, Electrical and Chemical Testing

Intern

Mount Joy Wire
Jun 2007 - Aug 2007 · 3 mos
Production Line Quality Control and RMA Tracking
Product Material Testing...

**Maintenance Worker**

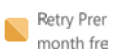
Philhaven Hospital
Jun 2006 - Aug 2006 · 3 mos
General Building Maintenance and Landscaping

Education**Messiah University**

B.S. Engineering, Electrical & Mechanical
2009 - Dec 2012

**Embry-Riddle Aeronautical University**

BE, Aerospace Engineering

**Anthony Calabro**

Chief Product Officer at InductEV Wireless Char...

More

Message

Connect

← Experience

**InductEV**

10 yrs 1 mo

CTO & Chief Product Officer

Full-time

Nov 2022 - Present · 1 yr 11 mos

Philadelphia, Pennsylvania, United States

Skills: Electric Vehicles · Electrification · Wireless charging · Charging · Vehicle charging · Chargers · Product Strategy

CTO

Full-time

Nov 2021 - Dec 2022 · 1 yr 2 mos

Momentum Dynamics is the global leader, developer and technology provider of fast, efficient autonomous wireless charging systems for all types of electrical vehicles including automobiles, buses, last-mile delivery, heavy trucks, and industrial equipment.

Skills: Electric Vehicles · Electrification · Wireless charging · Charging · Vehicle charging · Chargers · Product Strategy

Vice President of Software Systems

Aug 2017 - Nov 2021 · 4 yrs 4 mos

Malvern, PA

Skills: Electric Vehicles · Electrification · Wireless charging · Charging · Vehicle charging · Chargers

Principal Software Engineer

Sep 2014 - Aug 2017 · 3 yrs

Malvern, Pa

Momentum Dynamics' high-power wireless charging system delivers energy to electric vehicles via induction ten times faster than plug-in chargers and can help accelerate consumer EV adoption.

Skills: Electric Vehicles · Electrification · Wireless charging · Charging · Control Systems · Vehicle charging · Chargers

Principal Software Engineer

Humanistic Robotics, Inc

Jul 2012 - Sep 2014 · 2 yrs 3 mos

Philadelphia, pa

Skills: Electrification · Control Systems

Software Engineer

Lockheed Martin Space Systems Company

2009 - Jul 2012 · 3 yrs 7 mos

Newtown, Pa

Software Engineer

Skills: Control Systems

Embedded Software Engineer

Lockheed Martin

Jan 2006 - Jul 2012 · 6 yrs 7 mos

Software Engineer

Brian Wisniewski commented on a post • 6mo
Congratulations Ben!

Show all comments →

Experience



Senior Embedded Software Engineer
Lockheed Martin · Full-time
Mar 2023 - Present · 1 yr 7 mos



Momentum Dynamics
Full-time · 1 yr 10 mos
Senior Embedded Software Engineer
May 2022 - Feb 2023 · 10 mos
United States

Embedded Software Engineer
May 2021 - May 2022 · 1 yr 1 mo
Malvern, Pennsylvania, United States



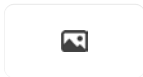
LHP Engineering Solutions
6 yrs 3 mos
Columbus, IN
Senior Software Engineer
May 2015 - May 2021 · 6 yrs 1 mo
Accountable for developing software solutions for highly technical challenges that face LHP's diverse clientele utilizing modern technology,...
Embedded Controls Intern
Mar 2015 - May 2015 · 3 mos
As part of my internship, I completed an intensive 6 week apprenticeship in embedded control systems specifically related to the automotive industry...



Teaching Assistant
Lehigh University
Sep 2013 - Jan 2015 · 1 yr 5 mos
Packard Laboratory
ME 242: System Dynamics & ME 343: Control Systems
As a teaching assistant at Lehigh Universities, I gained invaluable experienc...



Temple University
1 yr 5 mos
Greater Philadelphia Area
Teaching Assistant
Sep 2011 - Sep 2012 · 1 yr 1 mo
Assisted teaching freshman engineering students introduction to engineering prototyping, including elementary SolidWorks CAD software...
Undergraduate Lab Technician
May 2011 - Sep 2011 · 5 mos
As an engineering lab technician, I had the unique opportunity to be one of two students who worked closely with university personnel to reinvent...



News Center
It is one thing as an engineering freshman to learn to concepts of civil, electrical and mechanical engineering;...

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month fre**FRANK MCMAHON**

SVP, Research & Development at Momentum ...

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Experience



Momentum Dynamics

7 yrs 1 mo

SVP, Research & Development

Full-time

Jul 2020 - Present · 4 yrs 3 mos

Malvern, Pennsylvania, United States

InductEV, formally known as Momentum Dynamics, develops high power inductive charging systems and technologies for the automotive and transportation industries. Its proven Wireless Power Transfer (WPT) technology allows electric vehicles to be connected to the electrical power grid without the use of cables or wires and can safely transmit electrical energy through air, water, and ice at power levels ranging from tens of kilowatts to hundreds of kilowatts.

Served as the head of Research & Development, directing a team of engineers and technicians in developing advanced technologies for incorporation into the InductEV high power inductive charging product portfolio, including:

- Inductively coupled communication system
- Integrated antennas
- Vehicle alignment systems
- Artificial Intelligence (AI)
- Machine Learning (ML)
- Sensor Fusion
- Thermal Imaging
- High-power inductive charging coil
- Thermal management
- Synchronous rectification electronics
- Foreign Object Detection (FOD)
- Living Object Detection/Protection (LOD/LOP)
- Electromagnetic modeling
- Cost reduction technologies (molding, casting)

Served as the Technical Lead and strategist for InductEV Intellectual Property (e.g. patents, trade secrets)

Served as the Technical Lead and strategist for InductEV Standards efforts

Developed strategy and directed efforts for Radio Frequency (RF) emissions testing (conducted and radiated) of the high-power WPT system for compliance with US and EU regulatory requirements

Developed a Systems Engineering organization within Momentum Dynamics that focuses on formal generation and management of system architectures and requirements for the product portfolio.

Skills: Leadership · Reliability · Simulations · Collaborative Style · Problem Solving · Agile & Waterfall Methodologies · Engineering Leadership · Prototyping · Engineering · Design for Manufacturing · Strategic Thinking · Cross-functional Team Leadership · Annual Budgeting · Critical Thinking · Executive Management

Vice President Research And Development

Full-time

Dec 2018 - Jul 2020 · 1 yr 8 mos

Malvern, Pennsylvania, United States

Skills: Engineering Management · Leadership · Reliability · Simulations · Collaborative Style · Problem Solving · Agile & Waterfall Methodologies · Engineering Leadership · Prototyping · Engineering · Research and

Development (R&D) · Design for Manufacturing · Strategic Thinking · Cross-functional Team Leadership · Annual Budgeting · Product Development · Critical Thinking · Executive Management · System Architecture · Technical Leadership

Director, Research & Development

Full-time
Apr 2018 - Dec 2018 · 9 mos
Malvern, PA

Skills: Engineering Management · Leadership · Reliability · Simulations · Collaborative Style · Problem Solving · Design Documents · Agile & Waterfall Methodologies · Engineering Leadership · Prototyping · Engineering · Research and Development (R&D) · Design for Manufacturing · Strategic Thinking · Cross-functional Team Leadership · Annual Budgeting · Product Development · Critical Thinking · Printed Circuit Board (PCB) Design · System Architecture · Technical Leadership

Senior Product Realization Engineer

Sep 2017 - Apr 2018 · 8 mos
Malvern, PA

Joined MDC in September 2017 as a Senior Product Realization Engineer responsible for taking the conceptual ideas for an inductively coupled communications link and developing it into a mature product. The equipment enables secure, low-latency, point-to-point full-duplex communication between the power delivery electronics and the vehicle electronics.

Skills: Leadership · Simulations · Collaborative Style · Problem Solving · Design Documents · Agile & Waterfall Methodologies · Engineering Leadership · Prototyping · Engineering · Research and Development (R&D) · Design for Manufacturing · Product Development · Critical Thinking · Printed Circuit Board (PCB) Design · Technical Leadership

Invested Time in Family and Community
Dec 2014 - Aug 2017 · 2 yrs 9 mos
Malvern, PA

Invested time in raising my teenage children, encouraging and facilitating their interests in music, scouting, church, sports, and service activities. Provided cultural opportunities for them via international travel. Hiked and backpacked domestically.
Volunteer with Boy Scouts of America: Committee Member, Religious & Service Coordinator, Assistant Scoutmaster, Merit Badge Counselor, Quartermaster
Participated in and provided technical guidance for numerous Eagle Scout projects that benefited local schools, churches, animal shelters, parks, and trails.




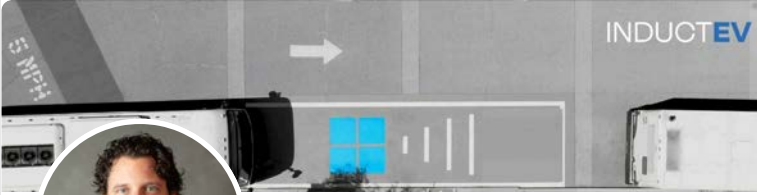
Director, Systems Engineering & Architecture



TruePosition
Jul 2007 - Nov 2014 · 7 yrs 5 mos
Berwyn, PA


Served as Director of Systems Engineering & Architecture within the Product Development organization. Directed team of highly-skilled systems engineers in developing use cases from feature or product-level requirements and turning them into specific system and component requirements for hardware and software teams to implement.


- 2014 Leadership Award
- Product ideation and concept development
- User story and use case development
- Specifications and requirements generation for network servers, mobile phones, and custom HW
- Test cases and analysis for product verification
- UMTS, LTE, CPRI, E-CID
- Agile and "waterfall" project management environments
- Customer focus

Rejoined TruePosition as Principal Systems Engineer in July 2007, tasked with




Jason Stolnis  · 2nd
VP, Engineering at InductEV


- InductEV
-  Drexel University

West Chester, Pennsylvania, United States · [Contact info](#)
500+ connections
 Maria Tabbut, Ryan Taggart, and 13 other mutual connections
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Highlights

**You both worked at InductEV**
You both worked at InductEV from June 2021 to September 2022
[Message](#)

About

Experienced Project Engineer and Systems Engineering Manager with a demonstrated history of working in the aviation and aerospace industry. Skilled in Systems Engineering, Project Engineering, Project Management and Engineering Management. Strong engineering professional with a BS focused in Electrical and...

Activity


698 followers

Jason Stolnis commented on a post · 6mo
Great to have you onboard Jason! Welcome to the team

Jason Stolnis commented on a post · 7mo
Congrats Brett

[Show all comments →](#)

Experience

**InductEV**
4 yrs 8 mos

VP of Engineering

Full-time

Nov 2022 - Present · 1 yr 11 mos

 **Contract Requirements**

Director, Systems Engineering

Full-time

Nov 2021 - Nov 2022 · 1 yr 1 mo

Malvern, Pennsylvania, United States

 **Contract Requirements**

Principal Systems Engineer

Feb 2020 - Nov 2021 · 1 yr 10 mos



Boeing

17 yrs 2 mos

H-47 Chinook Systems Engineering Manager

Full-time

Apr 2017 - Feb 2020 · 2 yrs 11 mos

Greater Philadelphia Area

Managing team of 18 Systems Engineers supporting the H-47 Chinook helicopter program. Supporting all phases of the program lifecycle;...

 **Contract Requirements**

H-47 System Safety Engineering Manager

Oct 2016 - Apr 2017 · 7 mos

Philadelphia, PA

Managing the team of system safety engineers on the H-47 Chinook spanning development, production and fleet sustainment programs. Ensur...

 **Contract Requirements**

Project Engineer - Multi-Disciplinary

Full-time

2003 - Apr 2017 · 14 yrs 4 mos

Philadelphia, PA

September 2012 - Present

Project Engineer for US Army CH-47 Block II development program. ...

 **Contract Requirements**

Intern & Assistant Audio Engineer

Big Sky Audio

1997 - 2000 · 3 yrs

Education



Drexel University

BS, Electrical and Electronics Engineering

1998 - 2003

Skills


Contract Requirements




5 experiences across InductEV and 2 other companies

Engineering




Endorsed by David Gambill and 2 others who are highly skilled at this



confidence in oral health



Amardent - Our Products
amardent.com




70


6 comments

Jerry Frank reposted this • 9mo




So proud of my kids new product! He's on the way to changing dentistry! For the good!



confidence in oral health



Amardent - Our Products
amardent.com




16

3 comments

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Experience


- 

Senior Electrical Engineer

DPI UAV Systems

Jan 2023 - Present · 1 yr 9 mos

Philadelphia, Pennsylvania, United States

Extending humanity's reach with unmanned helicopters.
- 

Momentum Dynamics


Full-time · 3 yrs 4 mos

Manager of Electrical Engineering

Jan 2020 - Jan 2023 · 3 yrs 1 mo

Malvern, PA

Working on the next generation in wireless charging for the transportation market.
- Principal Electrical Engineer


Oct 2019 - Jan 2020 · 4 mos
- 

Sr. Pulse Power Engineer

Silicon Power Corporation

Dec 2017 - Oct 2019 · 1 yr 11 mos

Malvern, PA

Design and develop high voltage pulse power equipment for commercial, industrial and military application.
- 

Advanced Plasma Solutions Co. Inc

3 yrs 2 mos

Malvern, PA

Senior High Voltage Systems Engineer

Dec 2015 - Nov 2017 · 2 yrs

Responsible for the design and implementation of power systems for non-thermal plasma reactors. This includes gliding arc, dielectric barrier...

High Voltage Systems Engineer

Oct 2014 - Nov 2017 · 3 yrs 2 mos

Design power systems for non-thermal plasma processing equipment.
- Electronics Engineer

Performance Controls, Inc.

May 2012 - Oct 2014 · 2 yrs 6 mos

Montgomeryville, PA

Design and develop power electronics in support of precision motion control systems and world class MRI gradient amplifiers...

**Sr Mechatronics Engineer**

Burro · Full-time

Jun 2023 - May 2024 · 1 yr

Philadelphia, Pennsylvania, United States · On-site

**Mechanical Design Engineer**

Kratos Defense and Security Solutions · Full-time

Nov 2022 - Jun 2023 · 8 mos

Dallastown, Pennsylvania, United States · On-site

**InductEV**

7 yrs 7 mos

Mechanical Engineer

Full-time

Jan 2020 - Jul 2022 · 2 yrs 7 mos

Malvern, Pennsylvania, United States

- Led a multidisciplinary team through design, testing, and manufacture of several new IP68 thermal imaging and wireless power management...

💡 Design for Manufacturing, Computer-Aided Design (CAD) and +11 skills

Mechanical Engineering Co-op

2017 - 2020 · 3 yrs

Malvern, Pennsylvania, United States

- Designed, tested, and manufactured vehicle based IP67 high-power management and control modules....

💡 Computer-Aided Design (CAD), Product Management and +8 skills

Mechanical Engineering Intern

2015 - 2017 · 2 yrs

Malvern, Pennsylvania

- Worked in Solidworks routing low voltage and high voltage wiring for on vehicle charging units ...

💡 Computer-Aided Design (CAD), SOLIDWORKS and +9 skills

Education**Rochester Institute of Technology**

Bachelor's Degree, Mechanical Engineering

2014 - 2019

💡 Arduino IDE, Confluence and +8 skills

Licenses & certifications**OSHA 30**

360training

Issued Jun 2022

EIT

Pennsylvania State Registration Board for Professional Engineers

Issued Mar 2021

Projects**Dividr**

Feb 2016 - Jun 2018

**Senior Technician - Product Testing and Development**

Greene Tweed · Full-time

Jan 2024 · Present · 9 mos

Kulpsville, Pennsylvania, United States · On-site

InductEV (momentum dynamics)

Full-time · 2 yrs 7 mos

Malvern, Pennsylvania, United States

Lead Technician/production

Dec 2022 · Jan 2024 · 1 yr 2 mos

On-site

- Direct and manage a production team of 15 members, ensuring a 95% on-time delivery rate of specialized wireless electronic systems. ...

Engineering, Wire and +1 skill

Field Technician /Manufacturing Technician

Jul 2021 · Jan 2024 · 2 yrs 7 mos

Commission and maintain 15 wireless charging sites around the country and provided highly technical troubleshooting for customers and other field...

**Fatigue and Fracture Technician**

Laboratory Testing Inc. · Full-time

Aug 2019 · May 2022 · 2 yrs 10 mos

hatfield

-Troubleshoot, service and repair hydraulic pumps and servo hydraulic test frames. To include making cables and troubleshooting electronic controller...

**Hydraulic Technician**

Chant Engineering Co. Inc.

Sep 2018 · Aug 2019 · 1 yr

chalfont

- Build hydraulic, mechanical and electrical components to engineering prints....

**Maintenance Technician**

Penn Color, Inc.

Jul 2018 · Sep 2018 · 3 mos

Hatfield

Handle all request by supervisors or crew members for machines that have had issues. Diagnose and repair electrical, hydraulic and mechanical issues....

[Show all 9 experiences →](#)**Education****Montgomery County Community College**

Bachelor of Engineering - BE, Electrical and Electronics Engineering

Aug 2022 · Aug 2025

Grade: 3.4

**Lansdale School of Business**

Associate's degree, Network and System Administration/Administrator

2013 · 2016

Classes: network security, Active directory, windows server, network infrastructure, SQL, computer hardware, adobe InDesign, accounting, writt...

Licenses & certifications

CompTIA A+

CompTIA



Diana Wilmes, SHRM-CP
Director of People at InductEV, Inc.

[More](#)[Message](#)

← Experience



InductEV
5 yrs 6 mos

Director of People Operations

Full-time

Jul 2023 - Present · 1 yr 3 mos

King of Prussia, Pennsylvania, United States · Hybrid

Skills: Employee Counseling · Confidentiality · Employee Management · Emotional Intelligence · Operations · Organization Skills · LQA · Compensation · Reporting

People Ops Manager

Full-time

Jan 2023 - Jul 2023 · 7 mos

King of Prussia, Pennsylvania, United States

Skills: Employee Counseling · Communication · Employee Benefits · Confidentiality · Employee Management · Emotional Intelligence · Operations · Organization Skills · LQA · Human Resources Information Systems (HRIS) · Compensation · Reporting · U.S. Family and Medical Leave Act (FMLA)

Senior Human Resources Generalist

Full-time

Dec 2022 - Jan 2023 · 2 mos

Skills: Communication · Employee Benefits · Confidentiality · Employee Management · Emotional Intelligence · Organization Skills · LQA · Human Resources Information Systems (HRIS) · Reporting · U.S. Family and Medical Leave Act (FMLA)

Operations & HR Generalist

Full-time

Nov 2021 - Dec 2022 · 1 yr 2 mos

United States

Skills: Communication · Employee Benefits · New Hire Orientations · Confidentiality · Emotional Intelligence · Organization Skills · LQA · Human Resources Information Systems (HRIS) · Reporting · U.S. Family and Medical Leave Act (FMLA)

Operations & HR Coordinator

Apr 2019 - Nov 2021 · 2 yrs 8 mos

Skills: Communication · Employee Benefits · New Hire Orientations · Confidentiality · Emotional Intelligence · Organization Skills · LQA · Human Resources Information Systems (HRIS) · Reporting · U.S. Family and Medical Leave Act (FMLA)



Accounts Payable Specialist

IMA Consulting

Jul 2017 - Dec 2018 · 1 yr 6 mos

Chadds Ford, Pennsylvania

(Acquired by Revint Solutions)

Skills: Communication · Confidentiality · Organization Skills



Accounts Payable Specialist

Revint Solutions



Payroll Status Change Request Form

Employee Name: Taylor Johnson

Employee #: 241

Employment/Compensation Change:

<input type="checkbox"/> New Hire	<input checked="" type="checkbox"/> Promotion	<input type="checkbox"/> Termination
<input checked="" type="checkbox"/> Merit Increase	<input type="checkbox"/> Re-Evaluation of Job	<input type="checkbox"/> Voluntary <input type="checkbox"/> Involuntary
<input type="checkbox"/> Bonus	<input type="checkbox"/> Increased Responsibilities	<input checked="" type="checkbox"/> Other _____
 <input type="checkbox"/> Leave		
<input type="checkbox"/> FMLA	<input type="checkbox"/> STD	<input type="checkbox"/> LTD <input type="checkbox"/> Military

Current Annual Salary/Hourly Rate: [REDACTED]

Hourly Rate/Bi-Weekly Change: From: [REDACTED] To: [REDACTED] Eff. Payroll Date: 05/14/2021

☒ Hourly ☐ Biweekly

Current Annual Salary/Hourly Rate: _____

Hourly Rate/Bi-Weekly Change: From: _____ To: _____ Eff. Payroll Date: _____

☐ Hourly ☐ Biweekly

Bonus Amount: _____

Job Title Change: To: _____ Eff. Date: _____

Dept. Change: To: _____ Eff. Date: _____

Part Time/Full Time Change: ☐ Part time to Full time ☐ Full time to Part time

Effective Payroll Date: _____

Supervisor Change: From: _____ To: _____ Eff. Payroll Date: _____

Comments:

Approved (increase+promotion to [REDACTED] additional per hour);

Approval Signature: See Signed DocuSign - Signed EE Comp Merit Inc FOR APPROVAL PDF - Approved April 2021

From: [Patti Rensel](#)
To: [Diana Wilmes](#)
Subject: pay increases eff 11 /21 and for payroll today
Date: Monday, December 5, 2022 10:54:24 AM
Attachments: [Salary increases on 12 5 effective 11 21 for payroll .xlsx](#)

The attached pay increases have been approved, effective 11/21 and to be implemented today.

REDACTED

Taylor Johnson, title change to Warehouse and Logistics Lead, **REDACTED**

REDACTED

Please let me know if you have any questions. Please don't change Bamboo HR for **REDACTED** Taylor and don't change their signatures until I get back to you. Thanks

Patti Rensel

HR, Director

O: 484-320-8222 ext. 156

M: 609-980-9339

InductEV™



Wireless EV Charging

f/k/a Momentum Dynamics


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Jennifer Steiner · 2nd
Systems and Test Engineering Manager at InductEV




- InductEV
-  Widener University

Conshohocken, Pennsylvania, United States · [Contact info](#)
440 connections
 Maria Tabbut,  Ryan Taggart, and 10 other mutual connections

[Connect](#) [Message](#) [More](#)

Highlights

 **You both worked at InductEV**
You both worked at InductEV from June 2021 to September 2022
[Message](#)


Activity

442 followers


Jennifer hasn't posted yet
Recent posts Jennifer shares will be displayed here.

[Show all activity →](#)


Experience

 **InductEV**
4 yrs

Systems and Test Engineering Manager
Full-time
Jan 2023 - Present · 1 yr 9 mos
On-site

 Strategic Thinking, Program Management and +5 skills

Sustaining Engineering Manager
Full-time
Jan 2022 - Jan 2023 · 1 yr 1 mo

 Strategic Thinking, Program Management and +7 skills

Technical Project Manager

Oct 2020 - Jan 2022 · 1 yr 4 mos

New Product Rollout, Strategic Thinking and +10 skills

Senior Design and Development Electrical Engineer

Lutron Electronics

Jan 2014 - Oct 2020 · 6 yrs 10 mos

Agile PLM, New Product Rollout and +14 skills

Lutron Electronics

4 yrs 8 mos

Design and Development Engineer

Jun 2010 - Jan 2013 · 2 yrs 8 mos

Agile PLM, New Product Rollout and +11 skills

Project Engineer

Jun 2008 - Jun 2010 · 2 yrs 1 mo

Agile PLM, Program Management and +3 skills

Education



Widener University

Bachelor's degree, Electrical and Electronics Engineering
2004 - 2008

Skills

Agile PLM

3 experiences at Lutron Electronics

Program Management



6 experiences across InductEV and 2 other companies

Show all 48 skills →

Interests

Companies

Schools



Lutron Electronics

90,178 followers

+ Follow



Widener University

45,923 followers

+ Follow

Show all companies →

Resource Allocation · Python (Programming Language) · Scrum · Microsoft Power BI · Quantitative Analytics · Business Strategy · Business Modeling · Program Management · Internet Security · Strategic Leadership · Software Deployment · Agile Leadership · Business Process · Stakeholder Engagement · Creative Problem Solving · Analytical Skills · Basic Accounting · Clear Communications · Operations Management · User Requirements · Technical Writing · Analytical Reasoning · Machine Learning · Team Building · Change Management · Walkthroughs · Critical Thinking · Presentation Skills · Communication



InductEV

Full-time · 2 yrs 8 mos

Greater Seattle Area · Remote

Principal Strategy Consultant

Oct 2019 - Jun 2020 · 9 mos

Demonstrated expertise in strategy and technology by providing cutting-edge insights on emerging technologies and cyber threats to enable the company to mitigate risks and bolster their competitive edge. Conducted in-depth research to deliver real-time information on innovative solutions, empowering the organization to make informed decisions and accelerate innovation.

Assessed the company's strategy and identified roadblocks faced by city and municipality customers, leading to the development of a sustainability framework that integrated environmental, social, and governance (ESG) considerations into the company's long-term strategy to enhance overall corporate responsibility.

Provided guidance on the utilization of data analytics tools to monitor and evaluate KPIs, enabling the company to make informed, real-time decisions to optimize strategic initiatives.

Performed in-depth trend analysis on EV van and truck adoption in a 400k vehicle fleet (1% EVs), resulting in productive discussions with 4 potential delivery partners, perfectly aligning with the company's expansion goals.

Provided strategic insights and recommendations for continued expansion into the EV bus market comprising 39% of 600k buses, leading to discussions with multiple municipal bus services laying the foundation for potential future partnerships.

Skills: Written Communication · Problem Solving · Business-to-Business (B2B) · Global Strategy · Operational Excellence · Product Management · Microsoft PowerPoint · Product Requirement Definition · Stakeholder Management · Analytics · Strategic Initiatives · Executive Support · Technical Proficiency · Innovation Management · Operations · Microsoft Office · Business Analytics · Cybersecurity · Performance Metrics · Product Marketing · Information Technology · Attention to Detail · Product Strategy · Data Visualization · Strategic Thinking · Product Cost Analysis · Financial Analysis · Process Improvement · Process Management · Strategic Marketing · Microsoft Excel · Quantitative Analytics · Business Strategy · Adaptability · Business Modeling · Strategic Leadership · Hardware Development · Business Process · Strategic Planning · Stakeholder Engagement · Pricing Strategy · Creative Problem Solving · Analytical Skills · Basic Accounting · Clear Communications · Business Development · Strategic Partnerships · User Requirements · Technical Writing · Analytical Reasoning · Technical Presentations · Key Performance Indicators · Teamwork · Management Consulting · Documentation · Venture Capital · Conflict Management · Interpersonal Skills · Critical Thinking · Go-to-Market Strategy · Presentation Skills · Communication

Sr. Business Strategist

Nov 2017 - Oct 2019 · 2 yrs

Drove strategic initiatives to propel business growth and establish a competitive advantage. Assisted with comprehensive strategic planning efforts to develop and execute market entry strategies, resulting in successful company expansion.

Conducted in-depth market analysis and competitive intelligence to identify emerging trends and opportunities, enabling the company to attract new customers and achieve revenue growth.

**InductEV**

Full-time · 3 yrs 8 mos
On-site

Director, Project Management Office

Nov 2021 - Mar 2023 · 1 yr 5 mos
Malvern, PA

Established a Project Management Office (PMO) at the company to define and maintain industry best practice standards for project manag...see more

💎 Cross-functional Team Leadership, Resource Allocation and +18 skills

Senior Technical Project Manager

Aug 2019 - Nov 2021 · 2 yrs 4 mos
Malvern, Pennsylvania, United States

Created, monitored, and controlled schedules and task activities for Gen 2 product development, field deployment, and production project: ...see more

💎 Cross-functional Team Leadership, Resource Allocation and +16 skills

**REALTOR®**

Long & Foster Companies
Feb 2018 - Sep 2020 · 2 yrs 8 mos
Doylestown, PA

The Long & Foster family consists of real estate professionals across the Mid-Atlantic and Northeast, from North Carolina to New Jersey. It is a fami...

💎 Resource Allocation, Process Improvement and +9 skills

**Engineering Program Manager at Northrop Grumman**

Aerotek
Oct 2018 - Aug 2019 · 11 mos
Sykesville, MD

As a contractor through Aerotek, I worked at Northrop Grumman Power & Control Systems in Sykesville, Maryland as an Engineering Program Manag...

💎 Cross-functional Team Leadership, Resource Allocation and +11 skills

**Cobham**

8 yrs 1 mo
Lansdale, PA

Senior Manager, Electrical Engineering and Engineering Operations

2015 - 2017 · 2 yrs

Senior Functional Engineering manager for the Engineering Operations department providing product development process management,...

💎 Cross-functional Team Leadership, Resource Allocation and +13 skills

Engineering Project Manager, Lowell Business Transition

2014 - 2015 · 1 yr

Led the successful transition of the Engineering business from Lowell, MA to the Lansdale, PA, San Jose, CA, Exeter, NH, and Clearwater, FL facilities....

💎 Cross-functional Team Leadership, Resource Allocation and +14 skills

Manager, Test & Technical Support

2009 - 2014 · 5 yrs

Functional manager for the Test & Technical Support (TTS) Engineering department providing line management and technical leadership resulting...

💎 Cross-functional Team Leadership, Resource Allocation and +9 skills



I'm happy to share that I'm starting a new position as User Acceptance Testing Specialist at Burro!



31

12 comments

[Show all posts →](#)

Experience



User Acceptance Testing Specialist

Burro · Full-time

Feb 2024 - Present · 8 mos

Philadelphia, Pennsylvania, United States · Hybrid



InductEV

Full-time · 2 yrs 8 mos

Malvern, Pennsylvania, United States

Field Service Lead

Sep 2022 - Sep 2023 · 1 yr 1 mo

Hybrid

Electro Mechanical Technician

Feb 2021 - Oct 2022 · 1 yr 9 mos



Maintenance Supervisor

Timberlane, Inc. · Full-time

Feb 2016 - Nov 2019 · 3 yrs 10 mos

Montgomeryville, PA

Preventive Maintenance, Maintenance & Repair and +3 skills

Cell Technician

Mars Drinks UK Limited · Full-time

Feb 2009 - Jan 2016 · 7 yrs

West Chester, Pennsylvania, United States

Safety Management Systems, Training and +4 skills



Brewery Mechanic

Victory Brewing Company · Full-time

Aug 2007 - Nov 2009 · 2 yrs 4 mos

Downingtown, Pennsylvania, United States

Education



Montgomery County Community College

Electrical and Electronics Engineering

2020 - 2022

Grade: 4.0



Universal Technical Institute, Inc.

Associate's degree, Automobile/Automotive Mechanics

Technology/Technician

2008 - 2009

Grade: 4.0

[Show all 3 educations →](#)

Skills

Troubleshooting



JOB TITLE: Mechanical Buyer

JOB SUMMARY: We are seeking a highly skilled, organized Mechanical Buyer to join our growing company. Your responsibility will be the development of approved suppliers and managing the procurement of mechanical parts, examples: low, medium, high precision machined parts that are milled or turned; castings, injection molding, movement devices, sheet metal, weldment fabrications, or anything else that is mechanical in nature. Excellent organizational skills combined with a proficiency in new technologies are highly valued in this position.

ESSENTIAL FUNCTIONS/RESPONSIBILITIES:

- Develop new suppliers and work with Engineering on new technologies.
- Act as primary interface for Momentum Dynamics to communicate to suppliers the needs and expectations of product quality, delivery performance and overall company goals.
- Manage suppliers to provide continuous quality, delivery, and cost improvements.
- Interface with Engineering to ensure an accurate and timely implementation of new parts, revisions, or other tasks required to source the item.
- Process purchase orders, requisitions, and requests for quote for mechanical components.
- Produce and maintain all reports.
- Arrange and attend meetings.
- Negotiate agreements with suppliers to provide continuous improvements in quality, delivery, cost, and collaboration.
- Generally, help with larger purchases, reviews, and inventory matters.
- Ability to independently develop solutions to complex or unique assignments involving Mechanical items.

KNOWLEDGE, SKILLS AND ABILITIES:

- Knowledge of mechanical production processes and volume purchases
- Must be proficient at matching a supplier capability to the drawing requirements
- Ability to read and interpret mechanical drawings of a complex nature
- Ability to quickly adapt to changing conditions and solve problems immediately
- Excellent documentation, report writing and communication skills

EDUCATION AND EXPERIENCE:

- 5 years of previous experience in procurement of custom mechanical parts
- Proficient computer skills, including Microsoft Office Suite
- Able to multitask, prioritize, and manage time efficiently
- Strong organizational skills
- Ability to physically stand, bend, squat, and lift up to 25-30 pounds

TRAVEL REQUIREMENTS:

- Negligible

Momentum Dynamics Corporation is the global leader in high-power wireless charging for electric vehicles. The company's proprietary magnetic induction system offers commercial and passenger electric and hybrid vehicles the ability to charge their batteries under all weather conditions with completely automatic operation. Drivers no longer need to plug their vehicles into a charging station, and can charge routinely to achieve a full charge, and also "opportunistically" while traveling from destination to destination to achieve longer vehicle driving ranges. Momentum's systems for electric vehicles have been demonstrated with multiple vehicle types and can be installed at prices comparable to Level 3 plug-in public chargers. This technology is compatible with today's electric vehicle technology but is designed to meet the needs of tomorrow's more advanced vehicles.

Momentum

Automated Wireless Charging

April 28, 2021

Mr. Harry Nask
30 Walden Way
Coatesville, PA 19320

Dear Harry,

We are pleased to offer you a position with Momentum Dynamics Corporation (the "Company"), as Senior Mechanical Buyer. Should you decide to join us on the terms and conditions outlined in this offer, your anticipated official start date will be Monday, May 17, 2021.

The position of Senior Mechanical Buyer is an exempt position. Your initial Base Salary will be paid at the rate of [REDACTED] biweekly payroll, annualized at [REDACTED] per year. Your Base Salary will be payable in accordance with the Company's normal payroll procedures in effect at the time. The Company currently pays salary on a biweekly basis over 26 pay periods each year.

In addition, subject to the approval of the Company's Board of Directors and subject to you returning the signed Non-Disclosure, Non-Compete, and Confidential Information Invention Assignment Agreement on or before your start date, you will be eligible to participate in the Company's Incentive Stock Option (ISO) plan. The award and issuance of any stock options is subject to the availability of stock options and approval of the Company's Board of Directors and will be subject to the terms of all applicable plans and granting documents. You should note that the Company may modify job titles, salaries, and benefits from time to time as it deems appropriate.

The Company is excited about you joining and we look forward to a beneficial and productive relationship. Nevertheless, you should be aware that your employment with the Company is for no specified period and constitutes at-will employment. As a result, you are free to resign at any time, for any reason or for no reason. Similarly, the Company is free to conclude its employment relationship with you at any time, with or without cause, and with or without notice. We request that, in the event of resignation, you give the Company at least two weeks' notice.

The Company reserves the right to conduct background investigations and/or reference checks on all its potential employees as well as on any current employees prior to your start or periodically where such clearances are necessary for the Company's operations. Your job is therefore contingent upon a clearance of such a background investigation and/or reference check, if any.

For purposes of Federal immigration law, you will be required to provide to the Company documentary evidence of your identity and eligibility for employment in the United States. Such documentation must be provided to us within three (3) business days of your date of hire, or our employment relationship with you may be terminated. Please bring with you on your first day your driver's license or U.S. Passport and original Social Security Card or other proof of your eligibility to work in the United States.

Momentum Dynamics Corporation
3 Pennsylvania Avenue, Malvern, PA 19355-2417 USA
484.320.8222

CONFIDENTIAL
Momentum Dynamics Corporation

We also require that you, if you have not already done so, disclose to the Company any and all agreements relating to your prior employment that may affect your eligibility to be employed by the Company or limit the manner in which you may be employed. It is the Company's understanding that any such agreements will not prevent you from performing the duties of your position and you represent that such is the case. Moreover, you agree that, during the term of your employment with the Company, you will not engage in any other employment, occupation, consulting or other business activity directly related to the business in which the Company is now involved or becomes involved during the term of your employment, nor will you engage in any other activities that conflict with your obligations to the Company. Similarly, you agree not to bring any third-party confidential information to the Company, including that of your former employer, and that in performing your duties for the Company you will not in any way utilize any such information.

As a Company employee, you will be expected to abide by the Company's rules and standards as they are communicated to you during your employment.

As a condition of your employment, you are also required to sign and comply with the attached Non-Disclosure, Non-Compete, and Confidential Information Invention Assignment Agreement (the "Agreement") that requires, among other provisions, the assignment of patent rights to any invention made during your employment at the Company, and non-disclosure of Company proprietary information.

In the event of any dispute or claim relating to or arising out of our employment relationship, with the sole exception of any claims for injunctive relief for violation or threatened violation of the Agreement, you and the Company agree that any and all such disputes (each an "Arbitrable Dispute") shall be fully and finally resolved by binding arbitration in Philadelphia, Pennsylvania before a single arbitrator pursuant to the American Arbitration Association Employment Rules for employment disputes. For the avoidance of doubt, an Arbitrable Dispute shall include, but is not limited to, disputes or claims regarding the terms and conditions of your employment with the Company, claims for harassment or discrimination and claims relating to the separation of your employment with the Company. You agree that, by arbitrating all Arbitrable Disputes, you are waiving any and all rights to a jury trial. Arbitration shall be conducted by a single neutral and the parties shall each bear their own costs and attorneys' fees. The Company and you further irrevocably consent to the jurisdiction of the state and federal courts located in the Commonwealth of Pennsylvania for the purposes of deciding any claim for injunctive relief for any violation or alleged violation of the Agreement.

Notwithstanding the foregoing, you will also be able to participate in the Company's benefit offerings as they exist from time to time and subject to the terms and conditions of each applicable plan. The Company's current offerings which will be available to you include the following:

- You will be eligible to participate in the Company's medical, dental, vision and other benefits as defined during onboarding.
- You will be eligible to participate in the Momentum Dynamics 401K plan, currently available through Vanguard.
- The Company will offer you 19 days of PTO and National holidays as defined in our employee manual.

CONFIDENTIAL
Momentum Dynamics Corporation

To accept the Company's offer, please sign, and date in the space provided below, scan to judy.talis@momentumdynamics.com and return an original copy by regular mail or in person. We will also need a signed copy of the Agreement returned no later than Friday, April 30, 2021.

This letter, along with any agreements relating to proprietary rights between you and the Company, sets forth the terms of your employment with the Company and supersedes any prior representations or agreements including, but not limited to, any representations made during your recruitment, interviews or pre-employment negotiations, whether written or oral. This letter, including, but not limited to, its at-will employment provision, may not be modified or amended except by a written agreement signed by the Chief Executive Officer of the Company and you. This offer of employment will terminate, without further action by the Company, if it is not accepted, signed, and returned by Friday, April 30, 2021.

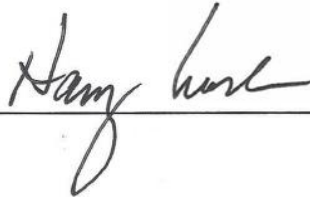
We look forward to your favorable reply, and to working with you at Momentum Dynamics Corporation.

Very truly yours,



Andrew Daga, President and CEO

Accepted By: _____



Date: _____

4/28/21



Planning Intern
Town of Ithaca · Internship
Jun 2024 - Aug 2024 · 3 mos
On-site



Momentum Dynamics
Full-time · 3 yrs 7 mos

VP, Supply Chain
Aug 2022 - Feb 2023 · 7 mos

Set overall direction for Supply Chain collaboration in the Sales, Finance, Operations, and Manufacturing Planning (S&OP) process...

Supervisor, Purchasing & Inventory Control
Aug 2019 - Aug 2022 · 3 yrs 1 mo
Malvern, PA

Set the vision and strategy for Demand Planning, Purchasing and Inventory Control...



Sr. Procurement Associate
Witmer Public Safety Group, Inc
Nov 2017 - Aug 2019 · 1 yr 10 mos

Managed existing vendor relationships and fostered new partnerships
Maintained pricing and item details...



Operations Intern
Solidarity Bridge
Jan 2016 - May 2016 · 5 mos
Evanston, IL

Managed Inventory Optimization Project, including organizing and tracking inventory and restructuring the use of space...

Show all 7 experiences →

Education



Cornell University
Master's degree, City/Urban, Community and Regional Planning
Aug 2023 - May 2025



Arizona State University
Global Heath
2014 - 2016

The BA in global health is a transdisciplinary degree program designed for students who seek a broad and flexible set of skills for understanding...

Volunteering


Volunteer
Jesus Nino Center -- Quito, Ecuador
Mar 2014 - Apr 2014 · 2 mos
Children

- Taught English to impoverished Spanish-speaking children
- Assisted teachers with classroom management ...


Skills

Military Training

2 endorsements



IEEE Transportation Electrification Certificate
1 page


 34

3 comments


Daniel Schwartz posted this • 9mo

Science, data, and art coming together to create an incredibly cool and refreshing take on conceptualizing electricity. ...

...show more




Watch electricity hit a fork in the road at half a billion frames per sec...
youtube.com

 6

Daniel Schwartz reposted this • 10mo

InductEV is hiring a Data Analyst! This role will play a crucial part in analyzing and extracting valuable insights from the extensive data sets generated by o ...show more


Data Analyst
Job by InductEV
King of Prussia, Pennsylvania, United States (On-site)

 11

3 comments


Show all posts →

Experience





InductEV
Full-time · 2 yrs 9 mos

Director of Customer Success
Sep 2022 - Present · 2 yrs 1 mo
King of Prussia, Pennsylvania, United States

 **Management, Business Development and +8 skills**


Manager of Technical Support
Jan 2022 - Sep 2022 · 9 mos
Malvern, Pennsylvania, United States


 **Business Initiatives, Management and +3 skills**




Field Service Manager
Go2power · Full-time
Feb 2020 - Jan 2022 · 2 yrs
Feasterville Trevose, Pennsylvania

• Led field service and technical support operations for a \$30M company, supervising four internal technicians and over a dozen third-party...

 **Business Initiatives, Management and +5 skills**





Modular Inverter Startup
Technical Support: 267-525-4230 x4275 215-244-4201
x4263 Bypass Alarm and Trip Alarm Checks:...



Applications Engineer
Lutron Electronics
Jun 2017 - Feb 2020 · 2 yrs 9 mos
Coopersburg, Pennsylvania

- Successfully completed highly selective and intensive 10-month rotational leadership program focused on developing project management, time...

 **Business Initiatives, Management and +5 skills**



2018 Lutron Construction Design and Development Recruiting

https://www.linkedin.com/in/danieljonschwartz/

2/7

**PTE 99 (02/16/2022 Text Message from Joren
Wendschuh, ECF 15-49(p.2)).**

12:37



8%



Joren(boss)

12:44 PM, Feb 16

Also had a conversation with Judy. She explained about the Tom issue on January 25th at 3pm. I'm sorry, I didn't consciously process it, as I have no recollection on it at all. Other instances yes, but not that one. Also discussed some re future promotions for you and career path. The conversation from last week did not get talked about. That's still between us and we should work out where we are with that a bit more this week, maybe just a brief written email rewriting job description and responsibilities so that we're both in agreement.

**PTE 100 (Cohen's 2018 and 2019 Overall
Manager Comments of B. Gallagher).**



2019 ANNUAL PERFORMANCE MANAGEMENT

Manager evaluation

Bill works well with others in the organization. He interacts with a lot of different people and communicates well and has a generally positive attitude and good working relationships.

AGILITY

Is readily adaptable to change and open to new ideas. Welcomes new or changing responsibilities, handles pressure well and can easily adjust or transition current plans to meet changing needs.

Employee self-evaluation

I started at MD designing all parts of the wireless charging system. As we added personnel, my focus evolved to GA electronics design and development.

In early 2019, the need arose for a person to do system testing, design integration, and troubleshooting of all Gen II HW and SW. I gladly accepted that role, and (I think) did a decent job in adapting. I will gladly accept more responsibility in a managerial role of Testing and QA.

Manager commenting on employee's demonstration of above competency:

Bill has shown his willingness and capabilities in contributing to the company in many roles over the years. Even while system test, integration and troubleshooting was his main focus this year, he also supported GA design with the build, test and verification of new processor modules for the GA controller.

OVERALL MANAGER COMMENTS:

Bill will be formerly taking over the test department in 2020 and I'm looking to Bill to develop standard Design and Production test plans, organize where to store test results, develop weekly test reports and generally make sure we are testing for as many hours a day as possible. I'm looking to Bill to take more responsibility for the testing drive the process more in 2020. We are integrating on vehicles with 350V, 450V, 540V and 730V nominal battery voltage systems and we need to do continuous testing at these voltages with varying air gaps and offsets. I'm looking forward to working with Bill to get the test department organized for successful design quality assurance in 2020. I'm also looking forward to having Bill work with Production to make sure appropriate production test setups and test plans are developed. Bill has put more safety features into our test setups and I'm looking to Bill to formalize those procedures including verifying proper assembly of new units prior to testing as much as is possible. We had a few failures in 2019 that were probably avoidable. This was not Bill's fault, but I'm looking to Bill to formally add another layer of procedure for testing new product. This may include working with our new SCM QA Manager to come up with production procedures and checklists as well as development procedures and checklists.

EMPLOYEE SIGNATURE: _____

MANAGER SIGNATURE: _____

DATE: 1/10/2020



2018 ANNUAL PERFORMANCE MANAGEMENT

Manager evaluation

Bill is always even tempered and works well with the rest of the team. I would like to see Bill take more of a lead on test engineering in 2019. Bill has not really been performing at a Principal level. As a Principal Engineer, Bill could provide the focus on our test infrastructure. Working with the rest of the team to figure out what equipment we need and how we can automate more of our testing. In 2019 we will be moving to contract manufacturing and we could use a problem-solving engineer working to make our testing processes extensible to a contract manufacturer.

INITIATIVE

Takes independent action including seeking out new responsibilities or opportunities. Supports an environment that encourages improvement, innovation and challenging traditional approaches.

Employee self-evaluation

I have tried to seek out, take on, and complete design tasks as needed to help the team finish up the Gen II boards. To do this, I have had to come up to speed on the Gen II designs, and learn how to use OrCAD PCB Editor.

I am looking forward to integration, testing, and troubleshooting of the Gen II system. This is my favorite part of the design cycle – reaping the rewards of our labor – making and seeing the system work!

Manager commenting on employee's demonstration of above competency:

I would like to see Bill work with John W on the testing and debugging of the Gen II system. This would help in getting more focus on the design testing and get a head start on writing production test procedures and automating some of the production testing.

OVERALL MANAGER COMMENTS:

Bill has contributed in several areas in 2018 including design support for some of the Gen II board designs as well as some research in FOD. Bill has not been performing at a Principal level in 2018 and requires more supervision than should be necessary. I'd like to have Bill take a leadership role for our Design Verification testing/Debug as well as our Production Test infrastructure development in 2019, but this can be discussed in the review.

EMPLOYEE SIGNATURE: _____

A handwritten signature in black ink, appearing to be "Bill", written over a horizontal line.

MANAGER SIGNATURE: _____

A handwritten signature in black ink, appearing to be "John W", written over a horizontal line.

DATE: 1/14/2019

**PTE 101 (04/03/2024 O. Jackson Dep. pp.
73(1119)-75(1123)).**

19 Q. I'm gonna scroll down. Okay.
20 I'm going to direct your attention to
21 paragraph 148. Do you see that?
22 A. Yes.
23 Q. I'm going to read this paragraph.
24 Omar Jackson is a former black male
25 coworker who at the time held 20 years of experience

1 and held roles beyond the requirements of the formal
2 role, yet was only promoted after controversy
3 surrounding hiring process for a senior technician.

4 Did I read that correctly?

5 A. You read it correctly. Yes.

6 Q. Do you agree with that statement?

7 A. I didn't get it until I started saying
8 something. Yes. That's how I feel. Yes.

9 Q. Okay. Let's just take the statement
10 piece-by-piece.

11 You held 20 years of experience;
12 correct?

13 A. Yes.

14 Q. You held roles beyond that of your --
15 one second, please. Strike that. Okay.

16 You held roles beyond the formal
17 requirements of your position.

18 Do you know what plaintiff -- do you
19 know what Ms. Acey is referring to here?

20 A. Like I guess she was thought I was doing
21 more at that job where I was doing. I was asked to
22 do that work. So that's the only thing I can think
23 of. That's just my thought.

24 Q. Did you feel that way at the time?

25 A. Yeah. I mean, when I said I needed the

Omar Jackson - by Mr. Longo

Page 75

1 raise, yeah. I told you that from the door. I told
2 you that I should have got that when I came through
3 the door.

4 Q. Understood.

5 But you didn't think that you were not
6 getting any raise; right?

7 A. No. I thought they were dragging their
8 feet.

9 Q. Now, when Ms. Acey refers to
10 controversy, do you know what she's referring to?

11 A. There was no controversy whether I was
12 gonna be a senior tech or not. It was just when they
13 was gonna pay me.

14 Q. So you're not aware of any controversy?

15 A. No, because I talked to Joren
16 extensively about it. He saw me working on it.

17 Q. You testified earlier, in your view, you
18 were promoted because of your extensive experience;
19 right? Because you work hard; right?

20 A. Correct.

21 Q. You made that clear to InductEV during
22 your time working for InductEV; right?

23 A. Yup.

**PTE 102 (04/03/2024 O. Jackson Dep. pp.
88(1118)-94(1119)).**

18 Q. Mr. Jackson, how long had you been
19 working for Momentum? I mean -- I'm sorry.

20 Mr. Jackson, you described asking to be
21 promoted to senior role; is that true?

22 A. Yes.

23 Q. Okay. How long had you been working at
24 M.D. before you first asked to be promoted?

25 MR. LONGO: Objection. Form.

1 A. Actually, I don't recall.

2 Q. Are you aware if you had been working
3 there for more than three months before you asked to
4 be promoted?

5 A. No. I know I didn't ask that soon.

6 Q. Okay. When you first asked to be
7 promoted, what was the -- did you get a response from
8 management?

9 A. Yes. Jorge said he's working on it.

10 Q. Did he give you any -- any indication
11 that there would be a delay?

12 MR. LONGO: Objection.

13 A. I can answer?

14 Q. Yes.

15 A. Was there gonna be a delay? He said he
16 was working on it and talking to HR in the process
17 trying to get us raises.

18 Q. Did he give you any reasons -- in
19 Joren's communications to you, did you perceive any
20 reason that your promotion would be delayed?

21 MR. LONGO: Objection. Form.

22 A. No. He just said he was trying to get
23 it done.

24 Q. Okay. I'd like to show -- I'm gonna
25 show Exhibit-55 that had been filed in this case as

1 Document 15-59. One second. Okay.

2 So I'm gonna read what the exhibit is
3 showing from here. It says: Experience -- and again
4 this exhibit was filed -- I'm sorry. I'm having some
5 trouble moving this tool bar.

6 It was filed May 16, 2023. So going
7 back, it says: Cleveland Cliffs, shift manager
8 October 2022 to present. Is that where you work? Is
9 that your role?

10 A. Yes.

11 Q. To both questions?

12 A. That's not my role anymore. I got
13 promoted.

14 Q. Okay. And then it also says -- so I
15 know you testified that you were promoted to senior
16 technician. But is this date November 2019 to
17 October '22, is this accurate for how long -- is this
18 accurate for your start and end dates with Momentum?

19 A. Yes.

20 MR. LONGO: Objection to form.

21 Q. Okay. And then it shows under
22 education, RETS Electronics, industrial electronics
23 technologist. Is this also what you see on this
24 exhibit?

25 A. Yes.

1 Q. Is that accurate?

2 A. Yes. I was a computer technician, as
3 well.

4 Q. Okay. Thank you.

5 Were you -- I'm gonna stop sharing this
6 exhibit.

7 Were you aware of the years of
8 experience that Seth Wolgemuth had? Were you aware
9 how many years of experience Seth Wolgemuth had?

10 MR. LONGO: Objection. Form.

11 A. No.

12 Q. Do you know how many years of experience
13 Seth Wolgemuth had when he was promoted?

14 MR. LONGO: Objection. Form.

15 Q. You can answer the question,
16 Mr. Jackson.

17 A. I said, no.

18 Q. All right. I'd like -- I'm gonna start
19 showing I think it is called Document 20-9 from the
20 case record. Please bear with me.

21 So this document was filed June 16,
22 2023. It was produced by the defendant. I believe
23 that to be the Bates number. All right.

24 Mr. Jackson, I'm gonna read this. And I
25 just want you to confirm if I'm reading it correctly.

1 Ben, Andy and I discussed we should
2 promote both blank and Omar to senior technician; is
3 that correct?

4 A. Yes.

5 MR. LONGO: Objection.

6 Ms. Acey, can you identify who the email
7 is between?

8 MS. ACEY: Sure. This part of the
9 exhibit shows the email from Judy Talis to former CEO
10 Andrew Daga. And I believe it was vice president of
11 engineering, Ben Cohen, and who is also Judy Talis'
12 brother.

13 Q. Mr. Jackson, were you aware of any other
14 employees being promoted to senior technician around
15 that -- are you aware of any other employees being
16 promoted to senior technician?

17 A. No.

18 MR. LONGO: Objection. Form.

19 Q. I'm gonna scroll down further. I'm
20 gonna scroll down to I guess this is -- I'm trying to
21 figure out where I want to start from. Sorry, guys.

22 Okay. So this part of the exhibit shows
23 an email from Joren Wendschuh sent to Ben Cohen on
24 September 2, 2021. I'm gonna read this out loud and
25 I just want you to confirm if this is what you are

1 also seeing on your screen.

2 Ben, I'm recommending out of cycle
3 promotions for both blank and Omar J, based on the
4 conversation with yourself and Judy last week,
5 incrementing their titles to senior technicians.

6 Is that what you see on your screen?

7 A. Yes.

8 Q. The next paragraph says: At least what
9 I'm seeing, Omar has been with us almost two years
10 now. And with his experience, he would have been
11 brought in as a senior technician, had he not been
12 out of the market for a number of years.

13 Is that what you see on your screen?

14 A. Yes.

15 Q. I just want to hone in on this portion
16 of this email.

17 Do you know what Joren is referring to
18 when he says you were, "out of the market?"

19 A. Yeah. I wasn't in the field. I took
20 myself out when I quit my job.

21 I was tennis coach for four years, three
22 years. I wasn't working in the industry. So when I
23 did get back into the industry, I was working odd
24 jobs. So that was the first or second electronics
25 job I got.

1 Q. So you're saying during this gap, were
2 you unemployed, or were you employed?

3 A. I was you could say both, a little of
4 both. I was employed. Then I was unemployed. Well,
5 I was unemployed for some time, then I found some
6 work. And then it was -- it was odd jobs, like I
7 said. And then I found some work at this place
8 called Faro, F-A-R-O, Technology.

9 Q. Is Faro Technology -- was Faro
10 Technology the employer that you had right before
11 going to InductEV?

12 A. Yes.

13 Q. How long did you work with them?

14 A. A year.

15 Q. Okay. So would you say at the time that
16 you applied to work with InductEV, you had 20 years
17 experience, or more than 20 years experience?

18 A. Yes.

19 MR. LONGO: Objection. Form.



PTE 103 (Descriptions of Senior and General Tech Roles with Resumes of O. Jackson and S. Wolgemuth)



JOB TITLE: Technician

REPORTS TO: Manufacturing Manager

DEPARTMENT: Productive Introduction

JOB CATEGORY: Technician

JOB SUMMARY:

Provides hands-on support in design and development efforts. Performs functions associated with all manufacturing operations, including working with engineers in set-up and calibration tasks, as well as performing rework and quality testing related to the production of parts, components, subassemblies and final assemblies. Develops and maintains methods, operation sequence and processes in the manufacture or fabrication of parts, components, subassemblies and final assemblies. Team member that contributes, advises and interfaces with engineering in coordinating the release of new products.

ESSENTIAL FUNCTIONS/RESPONSIBILITIES:

- Hands-on technical contributor for the hardware development organization.
- Collaboration with engineers throughout the Development, Test, Manufacturing, and Operations organizations to effectively identify and help resolve hardware design issues and assist in driving these issues to closure.
- Contribute in efforts to define and write test plans and reports.
- Develop and document fixes for equipment configuration issues and make recommendations for enhancements.
- Effectively document technical issues, test and measurement results, proposed solutions, etc.
- Develop and follow established processes and procedures.
- Participate in technical reviews.
- Provide regular status and progress towards milestones with team leads.
- Perform functional or parametric testing of electronic circuit boards or assemblies.
- Use schematic analysis combined with standard electronic test techniques to perform failure analysis and root cause determination to a component level.
- Perform component-level repair on these assemblies using both SMT and through-hole rework techniques.
- Assist the Engineering staff as necessary in the design, fabrication, or validation of new production test fixtures.

KNOWLEDGE, SKILLS AND ABILITIES:

- Ability to follow and assist in the development of processes and procedures.
- Ability to lead and motivate a team environment.
- Capable of reaching technical decisions within the scope of responsibilities.
- Must have ability to mentor and lead more junior technicians.
- Experience in cable design and assembly
- Proficient in use of small hand tools (e.g., pliers, screwdrivers, nut drivers)
- Able to troubleshoot independently to the component level, locating advanced manufacturing defects or defective components



- Test & debug electronics with an oscilloscope, multimeter, function generator and other electronic lab equipment.
- Build and rework prototype surface mount PCBA's, mixed-technology PCBA's and cable assemblies.
- Visually inspect work with a sharp eye for quality.
- Organize BOM's, order and manage electronic materials to support prototype builds.
- Create accurate written records of work.
- Maintain a clean, orderly and professional work environment and comfortable working in a shop/laboratory environment

CORE COMPETENCIES:

- **INNOVATION:** Generates new and creative ideas, products or methods. Shows great initiative and will readily challenge the status quo. Not afraid to take professional risk and supports change and solves problems creatively.
- **INTEGRITY:** Is trustworthy and honorable, displays professionalism, discretion, and sound judgment. Deals with others in a straightforward and honest manner, is accountable for actions, maintains confidentiality and supports company values. Inspires trust and behaves in a way that earns and maintains the respects of others.
- **QUALITY OF WORK:** Maintains high standards and delivers on time what was promised while adding value beyond what was expected. Is attentive to detail and accuracy – does it right the first time. Looks for improvements continuously, seeks to find the root cause of any problems or issues in a commitment to excellence.
- **TEAMWORK:** Is an honest and dependable team player who contributes to group collaboration and shows empathy and respect for others. Builds and maintains good working relationships. Actively solicits feedback from peers and other team members when planning and making significant decisions. Provides insight and readily shares their knowledge and experience. As a leader understands and advocates that the best solutions come from working collaboratively – establishes an atmosphere of trust, championing issues and sharing successes.
- **INITIATIVE:** Takes independent action including seeking out new responsibilities or opportunities. Supports an environment that encourages improvement, innovation and challenging traditional approaches.

EDUCATION AND EXPERIENCE:

- Associates degree, completion of electronic technology certification, or equivalent technical experience.
- 8+ years' experience in a test environment for emerging technology.

TRAVEL REQUIREMENTS:

- Minimal travel.



PHYSICAL REQUIREMENTS:

- Must be able to lift, stand for periods of time and work in a laboratory environment.



JOB TITLE: Senior Technician

REPORTS TO: Manufacturing Manager

DEPARTMENT: Productive Introduction

JOB CATEGORY: Technician

JOB SUMMARY:

Provides hands-on support in design and development efforts. Performs functions associated with all manufacturing operations, including working with engineers in set-up and calibration tasks, as well as performing rework and quality testing related to the production of parts, components, subassemblies and final assemblies. Develops and maintains methods, operation sequence and processes in the manufacture or fabrication of parts, components, subassemblies and final assemblies. Team member that contributes, advises and interfaces with engineering in coordinating the release of new products.

ESSENTIAL FUNCTIONS/RESPONSIBILITIES:

- Hands-on technical contributor for the hardware development organization.
- Collaboration with engineers throughout the Development, Test, Manufacturing, and Operations organizations to effectively identify and help resolve hardware design issues and assist in driving these issues to closure.
- Contribute in efforts to define and write test plans and reports.
- Develop and document fixes for equipment configuration issues and make recommendations for enhancements.
- Effectively document technical issues, test and measurement results, proposed solutions, etc.
- Develop and follow established processes and procedures.
- Participate in technical reviews.
- Provide regular status and progress towards milestones with team leads.
- Perform functional or parametric testing of electronic circuit boards or assemblies.
- Use schematic analysis combined with standard electronic test techniques to perform failure analysis and root cause determination to a component level.
- Perform component-level repair on these assemblies using both SMT and through-hole rework techniques.
- Assist the Engineering staff as necessary in the design, fabrication, or validation of new production test fixtures.

KNOWLEDGE, SKILLS AND ABILITIES:

- Ability to follow and assist in the development of processes and procedures.
- Ability to lead and motivate a team environment.
- Capable of reaching technical decisions within the scope of responsibilities.
- Must have ability to mentor and lead more junior technicians.
- Experience in cable design and assembly
- Proficient in use of small hand tools (e.g., pliers, screwdrivers, nut drivers)
- Able to troubleshoot independently to the component level, locating advanced manufacturing defects or defective components



- Test & debug electronics with an oscilloscope, multimeter, function generator and other electronic lab equipment.
- Build and rework prototype surface mount PCBA's, mixed-technology PCBA's and cable assemblies.
- Visually inspect work with a sharp eye for quality.
- Organize BOM's, order and manage electronic materials to support prototype builds.
- Create accurate written records of work.
- Maintain a clean, orderly and professional work environment and comfortable working in a shop/laboratory environment

CORE COMPETENCIES:

- **INNOVATION:** Generates new and creative ideas, products or methods. Shows great initiative and will readily challenge the status quo. Not afraid to take professional risk and supports change and solves problems creatively.
- **INTEGRITY:** Is trustworthy and honorable, displays professionalism, discretion, and sound judgment. Deals with others in a straightforward and honest manner, is accountable for actions, maintains confidentiality and supports company values. Inspires trust and behaves in a way that earns and maintains the respects of others.
- **QUALITY OF WORK:** Maintains high standards and delivers on time what was promised while adding value beyond what was expected. Is attentive to detail and accuracy – does it right the first time. Looks for improvements continuously, seeks to find the root cause of any problems or issues in a commitment to excellence.
- **TEAMWORK:** Is an honest and dependable team player who contributes to group collaboration and shows empathy and respect for others. Builds and maintains good working relationships. Actively solicits feedback from peers and other team members when planning and making significant decisions. Provides insight and readily shares their knowledge and experience. As a leader understands and advocates that the best solutions come from working collaboratively – establishes an atmosphere of trust, championing issues and sharing successes.
- **INITIATIVE:** Takes independent action including seeking out new responsibilities or opportunities. Supports an environment that encourages improvement, innovation and challenging traditional approaches.

EDUCATION AND EXPERIENCE:

- Associates degree, completion of electronic technology certification, or equivalent technical experience.
- 8+ years' experience in a test environment for emerging technology.

TRAVEL REQUIREMENTS:

- Minimal travel.



PHYSICAL REQUIREMENTS:

- Must be able to lift, stand for periods of time and work in a laboratory environment.

Omar Jackson

Coatesville, PA

Authorized to work in the US for any employer

Work Experience

Senior Technician

Momentum Dynamics - Malvern, PA

November 2019 to Present

I'm a senior technician have a minimum dynamics young start up company. As the company grows on learning more and leading the other technicians and I see your tech. I was the lead technician on several of the projects here and continue to be the lead technician in my department

Opto Techican

FARO Technologies - Exton, PA

November 2018 to Present

Build test and repair laser projectors.

Assembler

LCR Embedded Systems, Inc - Norristown, PA

January 2018 to October 2018

Worked 8 months for assembly company

Head Boys and Girls tennis coach

Bishop Shanahan High School - Downingtown, PA

July 2014 to October 2017

I became the head coach of the varsity girls and boys tennis teams at Bishop Shannahan High School. I was reponseable for two teams of kids with 25 kids per team.

Sports Coordinator / Supervisor

YMCA - Coatesville, PA

June 2014 to May 2015

I created and supervised a youth tennis program for kids 15 years old and under. I also help coordinate the sports program and scheduling.

Supervisor

CTDI

August 1995 to May 2014

Test and repaired units, surface mount and through hole soldering, and troubleshoot on component level before becoming supervisor of the modification department. I became supervised the modification department 2008-2014 that was my last six with the company. Lead a floor of 30+ people during day shift in the modification department.

Supervisor August 1995- May 2014
(Under Nathaniel Whitaker 484-716-8980)

Education

Other

Skills

- LEADERSHIP SKILLS (Less than 1 year)
- Soldering
- Assembly Line
- Assembly Worker
- Clean Room
- Solder

Certifications and Licenses

Driver's License

Additional Information

SKILLS

- ❖ Works well with children
- ❖ Works well with others and works diligently in groups/teams
- ❖ Managing skills
- ❖ Leadership skills

Phoenixville, PA

Senior Technician

- Utilized previous experience and in depth product knowledge to support R&D, Engineering, and manufacturing teams in process optimization and communicated opportunities for product improvement and cost optimization.
- Supported engineering teams by drafting test and assembly processes for pilot systems transitioning to manufacturing.
- Worked with business development and operations for assembly timelines as well as demonstrations for training and advertisements to investors.
- Sat on the safety committee and coordinated with the company executives and facilities manager to update company wide safety policies and implement facility updates.

- Lead technician in fabrication, assembly, and testing of pilot and prototype electrical and mechanical assemblies.
- Hands on PCB work, harness design, and assembly in automotive and commercial applications.
- On-site install and system service for OEM pilot systems for customers operating on a global scale.

- Worked on-call support for multiple industrial facilities.
- Performed in solo and group electrical installations.
- Responsible for in-home service calls and fleet maintenance.

- Managed multiple projects and day-to-day scheduling.
- Tasked in all phases of construction, remodeling, maintenance, and service..

- Quickly learned and performed tasks in a cooperative team environment.
- Operated light and medium duty equipment for residential and commercial projects.

Education

Lower Dauphin High School - Hummelstown, PA

September 2015 to March 2017

Skills

- Innovation
- Collaborative Leadership
- Industrial Technology
- Fabrication Light and Medium Duty Equipment
- Power and Hand Tools
- Soldering Cable Harness Work
- Problem Solving
- Manufacturing
- 3D Printing
- Engineering Safety Compliance
- Documentation
- JHA and Root Cause Analysis
- Lean Manufacturing Construction
- Time Management
- Pneumatic Systems
- ESD Control

Certifications and Licenses

AED Certification

First Aid Certification

CPR Certification

**PTE 104 (05/2021 and 09/2022 Hiring
evaluations and Emails amongst CAO, VP
Engineering and CEO, ECF 20-6 and 20-10).**



Interview Evaluation Form

Candidate Name: Assata Acey

Interviewer: Benjamin Cohen

Position: PI Senior Technician

Date: 05/14/2021

-
- 1.) **Culture Fit:** Candidate's beliefs and behaviors align with the company's core values and company culture.

Rate the candidate on a 1-5 scale (1 = not a fit; 5 = perfect culture fit)

1 ☐ 2 ☐ 3 ☐ 4 ☒ 5 ☐

Please comment on the reason for your rating:

Assata has a very interesting background and interests. She seems to be very curious and is looking to work in a company that has technology that interests her. I believe her interest in finding better ways to do things would be a benefit to the Product Introduction team.

- 2.) **Skill/Competency Fit:** Do the skills the candidate will bring to the job align with the job competencies?

Rate the candidate on a 1-5 scale (1 = not a fit; 5 = perfect skillset)

1 ☐ 2 ☐ 3 ☐ 4 ☒ 5 ☐

Please comment on the reason for your rating:

I cannot speak directly to her technician skills, however, with her strong background in Physics and her experience in various types of lab environments, I believe she has the skills and competency required for this job.

- 3.) **Technical Fit:** Does this candidate have the technical aptitude needed to succeed in this position?

Rate the candidate on a 1-5 scale (1 = not a fit; 5 = perfect technical fit)

1 ☐ 2 ☐ 3 ☐ 4 ☒ 5 ☐

Please comment on the reason for your rating:

I did not directly test her on technician skills as other were doing that. Through our conversations, she seems to be a very intelligent person and has a very curious mind. I think she would make a good problem solver.

- 4.) **Overall Fit:** Average your ratings and please select yes or no on moving forward with this candidate.

Average Rating: 4

Yes ☒ No ☐

Overall Comments:

I would want to hear from the team on how she did with technician tasks, but I think she would be an asset to the Product Introduction team. Her long term goals are to be a "patent scientist" which I believe means that she enjoys solving problems in unique ways that can lead to patents. I think we should also run her resume past Frank McMahon for his team if Product Introduction

From: [Judy Talis](#)
To: [Andrew Daga](#)
Cc: [Ben Cohen](#)
Subject: RE: Draft promotion request - feedback appreciated.
Date: Friday, September 3, 2021 3:11:09 PM

Ben,
Andy and I discussed we would like to promote both Seth and [REDACTED] to Senior Technicians. They will get a 15% increase each. This will not impact their annual increase at all.
We can discuss on Tuesday about communicating the promotion.
Thanks,
Judy

Judith Talis | Chief Administrative Officer
Momentum Dynamics Corporation
Fueling the Future of Electric Transportation

3 Pennsylvania Avenue, Malvern, PA 19355
(M) 610.613.1449
www.momentumdynamics.com

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From: Andrew Daga <andrew.daga@momentumdynamics.com>
Sent: Friday, September 3, 2021 10:33 AM
To: Judy Talis <judy.talis@momentumdynamics.com>
Subject: Re: Draft promotion request - feedback appreciated.

I agree on both.

Are you in office today? If not we can get on teams. I have my regular meeting with Tony Suflet at 11 this morning

Andrew W Daga | President and CEO
Momentum Dynamics Corporation
Fueling the Future of Electric Transportation
3 Pennsylvania Avenue, Malvern, PA 19355
(O) 484.320.8222 Extension 121
(M) 610.764.5491

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From: Judy Talis <judy.talis@momentumdynamics.com>

Date: Friday, September 3, 2021 at 9:47 AM

To: Andrew Daga <andrew.daga@momentumdynamics.com>

Subject: FW: Draft promotion request - feedback appreciated.

I agree we should promote Seth [REDACTED]. We can speak about this when you have a moment.

Thanks,

Judy

Judith Talis | Chief Administrative Officer

Momentum Dynamics Corporation

Fueling the Future of Electric Transportation

3 Pennsylvania Avenue, Malvern, PA 19355

(M) 610.613.1449

www.momentumdynamics.com

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From: Ben Cohen <ben.cohen@momentumdynamics.com>

Sent: Thursday, September 2, 2021 9:16 PM

To: Judy Talis <judy.talis@momentumdynamics.com>

Cc: Joren Wendschuh <joren.wendschuh@momentumdynamics.com>

Subject: Fwd: Draft promotion request - feedback appreciated.

Hi Judy,

I think Joren states this well. I recommend we promote both [REDACTED] and Seth.

From: Joren Wendschuh <joren.wendschuh@momentumdynamics.com>

Sent: Thursday, September 2, 2021 7:29 PM

To: Ben Cohen

Subject: Draft promotion request - feedback appreciated.

Ben,

I'm recommending out of cycle promotions for both Seth W. and [REDACTED] based on the conversation with yourself and Judy last week, incrementing their titles to Senior Technicians.

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED].

Seth has been with us for about 5 years - starting with us as a technician, he has greatly matured and currently is our SME on both GA and VA coil production, operating independently and providing guidance and training to our manufacturing team and CMs. With his current level of experience and his intimate knowledge of our product, I feel he has certainly earned his spot as a senior tech here at MD.

Please feel free to ask any questions or follow up, but strongly encourage that we consider promoting both [REDACTED] and Seth. I would like them to be recognized for their strong contributions to this company and their work efforts. Thank you!

Sincerely,

Joren Wendschuh

PTE 105 (04/11/2024 A. Acey Dep. p. 88(112-1119)).

2 Q. Well, in the fourth section of this
3 AA-9, the Interview Evaluation Form, it says
4 that, "had a great attitude and personality,
5 willing to be hands on, be here in person
6 every day, which is what the team needs.
7 Definitely seems to fit a engineering
8 position instead of a senior tech role."

9 Do you see that?

10 A. Yes, I do.

11 Q. Thoughts on that comment?

12 A. No. I mean, I think Ryan said the
13 same thing. Rob Rosenberger says the same
14 thing, and HR saw all of these. That's what
15 happened.

16 Q. Well, do you know -- well, what was
17 the position you were interviewing for?

18 A. I was interviewing for senior
19 technician.

**PTE 106 (12/2021 Company Handbook, p. 6
("Equal Employment Opportunities"), AA-
19).**



EMPLOYMENT MISSION AND PHILOSOPHY

Momentum Dynamics Corporation ("Momentum" or the "Company") strives to provide a productive workplace for all of its employees. Momentum Dynamics seeks personnel who are committed to providing a superior product and service, following Momentum Dynamics' policies and procedures, respecting the rights of fellow employees, and creating a workplace free of harassment, discrimination, or other wrongdoing.

GENERAL POLICIES

EQUAL EMPLOYMENT OPPORTUNITIES

Momentum Dynamics is committed to a workplace free from discrimination and harassment, where employees treat each other with respect, dignity and courtesy. We provide equal employment opportunities to all employees and applicants for employment without regard to race, color, ancestry, national origin, gender, sexual orientation, marital status, religion, age, disability, gender identity, results of genetic testing, service in the military or other group or characteristic protected by law. Equal employment opportunity applies to all terms and conditions of employment, including hiring, placement, promotion, termination, layoff, recall, transfer, leave of absence, compensation, and training.

Any employees with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of the CEO. The company will not allow any form of retaliation against individuals who raise issues of equal employment opportunity. If an employee feels he or she has been subjected to any such retaliation, he or she should bring it to the attention of the CEO to be investigated and appropriate action, up to and including termination if found to be in violation of this policy.

AMERICANS WITH DISABILITIES ACT (ADA) AND REASONABLE ACCOMMODATION

Momentum Dynamics is committed to compliance with all state and federal laws providing for nondiscrimination in employment against qualified individuals with disabilities, including the Americans with Disabilities Act ("ADA"). To ensure equal employment opportunities to qualified individuals with a disability, the company will make reasonable accommodations for the known disability of an otherwise qualified individual, unless undue hardship on the operation of the business would result.

Employees who may require a reasonable accommodation should communicate their request to their supervisor. If the employee feels uncomfortable making the request to their supervisor, the request should be communicated to the CAO or designate. The company will require, where appropriate, the submission of relevant medical documentation up to and including a medical examination. Requests will be reviewed, and a decision will be made as soon as the company can reasonably ascertain eligibility.

**PTE 107 (12/2021 Company Handbook, p. 17
(bottom portion), AA-19).**



Upon hire, employees will receive information regarding the specific health and dental plans available and the necessary enrollment forms that must be completed and returned to Human Resources.

CONTINUATION OF INSURANCE (COBRA)

The Consolidated Omnibus Budget Reconciliation Act (COBRA) entitles employees and their eligible dependents to continue health care coverage in specific situations. Employees should contact Human Resources regarding possible COBRA rights if their employment with Momentum Dynamics ends.

Under COBRA, employees should notify the Director of Human Resources if coverage is lost due to one of the following:

- The death of an employee's spouse covered under the health care coverage;
- Termination of spouse's employment (for reasons other than gross misconduct) or reduction in spouse's hours of the eligible employee;
- Divorce or legal separation of the eligible employee from the employee's spouse;
- The employee's spouse becomes eligible for Medicare; or
- Dependent children cease dependent status under the health care plan.

Employees, who choose continuation due to any reason listed above, are afforded the opportunity to maintain continuation coverage for 36 months, unless the employee lost group coverage because of termination of employment or reductions in hours. In that case, the required continuation coverage is 18 months.

An employee who elects continued coverage under COBRA is required to pay the full monthly premium plus an administration fee. The employee's continued coverage through Momentum Dynamics would cease when he/she may be covered for similar insurance under another group plan due to re-employment, re-marriage, Medicare, etc., or for failure to make monthly premium payments in the required plan time.

401(K) RETIREMENT AND SAVINGS PLAN

A 401(k) Retirement Plan is available, through payroll deduction, to full time and part-time (more than 1000 hours per year) employees.

- Minimum age: Twenty-one (21)
- Eligibility: Immediately

Eligible employees may enroll in the 401 (k) plan at any time at the rate of their choosing. The employee may change this rate at any time up to the maximum dollar amount defined by the United States Internal Revenue Service (IRS). There is currently a company match but the company reserves the right to implement or have no discretionary match as it may determine each year at its sole discretion.

**PTE 108 (12/2021 Company Handbook, p. 20
("Short Term Disability"), AA-19).**



If and when workers' compensation is paid to an Employee for missed work time that has already been covered by paid leave (PTO), the Employee shall make payment of said workers' compensation to Momentum Dynamics.

Employees who have questions concerning the payment of worker's compensation benefits are encouraged to contact Human Resources.

PARENTAL LEAVE

The company parental leave policy provides for (5) five days of Parental Leave for new parents in addition to other paid leave. New fathers and adoptive/foster mothers and fathers are eligible to take this leave within 3 months of the birth or adoption/foster placement of a child. For birthmothers, any additional paid leave over the parental leave is covered under the company's Short-Term Disability (STD)/Long-Term Disability (LTD) policy and duration of the leave will be determined within the terms of the STD/LTD policy.

SHORT TERM AND LONG-TERM DISABILITY (STD and LTD)

Short-term and long-term disability benefits are provided at no cost to the employee. You are eligible for this benefit if you are classified by the company as a full-time employee who is regularly scheduled to work 30 hours per week and become disabled from a non-occupational injury or illness. Coverage is provided based on the terms of the insurance. For copies of the requirements and payments available please see Human Resources as soon as possible once a potential leave is identified.

After the claim's manager determines eligibility, the plan will provide a percentage of base salary for a determined time based on the plan requirements. PTO will not accrue while receiving benefits under this plan. Questions regarding eligibility and coverage under this plan will be determined by the benefits provider.

BEREAVEMENT LEAVE

Upon the death of an employee's child, spouse, parent, in-law, grandparent, grandchild, brother or sister, an employee will, upon request, be granted bereavement time off from work to attend to those matters which arise from and are directly related to the death of such relative. MD will pay full-time employees up to 3 days of bereavement time off. MD will pay part-time employees 1 day of bereavement time off. Requests for bereavement time off must be submitted to Human Resources, which may request confirmation of the need for leave under this policy.

JURY DUTY LEAVE

Employees called to serve on a jury panel must notify their supervisor within 24 hours after receiving jury duty notice and must provide a copy of their jury summons at that time. Employees will not suffer any loss of pay for a maximum of (2) two days per calendar year while on jury duty leave. Unless mandated by law, the remainder of the jury duty leave will be unpaid. To be paid for jury duty leave, the company requires proof of jury duty attendance. While on jury duty leave, the company expects that the employee will report to work on any day that the employee is released from jury duty before 1:00 P.M.

**PTE 109 (04/18/2024 A. Acey Dep. pp. 57-65,
93-98, 129(1116)-130 (119), 242(1110)-243(1120)).**

1 A. Okay. So I did feel
2 embarrassed, and I did feel like there was a
3 large emotional component to what I
4 experienced. Actually, we're not even -- at
5 this time and even at the beginning of my
6 disability, we were still unsure how big a
7 role stress played in a lot of my symptoms.

8 Actually, a lot of the
9 neuroscientists, the neurosurgeons I saw were
10 confused about how much of my symptoms were
11 affected by the pituitary gland and how much
12 of them were affected by stress and lifestyle,
13 things like that.

14 Q. Is that the reason why you went
15 to see a therapist? I think it's -- I
16 apologize -- Ms. Malloy?

17 A. Ms. Chantele -- yeah,
18 Dr. Chantele -- Ms. Mallory, Mallory.

19 Q. Mallory.

20 A. M-A-L-L-O-R-Y. No. I went to
21 see her -- so I have this -- I always had like
22 a premise that if I was suicidal I would do
23 everything in my power to get support, and
24 that weekend I was suicidal, so I disclosed it

1 to my doctor so I could be accountable to her,
2 and I went to therapy right away. That was --
3 my first therapy session was June 22nd of
4 2022.

5 Q. Okay. And did the work you did
6 with Ms. Mallory address any issues that you
7 felt that you had visited upon you during your
8 employment at InductEV?

9 A. Absolutely. I think about 60
10 or more percent of the notes that were
11 disclosed in discovery are related to my
12 employment and my ability to cope with it,
13 and, yes. Actually, I was on suicide watch
14 this week, and Dr. Flom increased my
15 medication yet again. My husband has been
16 terrified, and he has been -- he took off this
17 week to stay home so that he could watch me
18 and keep me from driving because I have
19 intrusive thoughts. So that is the truth of
20 it unfortunately.

21 Q. Do you claim that that is
22 inspired because of what happened at InductEV
23 or because of issues associated with dealing
24 with the lawsuit? Or do you see those as the

1 same?

2 A. They're entrenched for me.

3 Q. Well, let's separate out -- I
4 will agree with you that there are several
5 references in your doctor's notes, and I'm not
6 going to make those an exhibit because --

7 A. I understand.

8 Q. -- I don't feel they need to
9 float in the permanent -- but I will suggest
10 to you that there are repeated references in
11 the notes that you are experiencing stress or
12 some kind of anxiety because of things that
13 happened in the lawsuit or having to work on
14 the lawsuit; is that fair?

15 A. Yes.

16 Q. Okay. Are you familiar with
17 having reviewed those notes where there is any
18 specific incident that occurred at work, for
19 example, dealing with Jorge or Brian Kenney or
20 Tom Hornberger or Judy Talis?

21 Do you see any of those
22 reflected in the notes of, you know,
23 Ms. Mallory?

24 A. So I think the notes from

1 August to -- let me try and make sure because
2 she did actually end up quitting, so I'm
3 trying to remember which January I'm trying to
4 talk about.

5 So, yeah, around that August up
6 to January of 2024, August 2022 to
7 January 2024, and then there was another
8 period between -- around the same time, so
9 it's kind of weird. Between November of 2022
10 and March of 2023, because -- specifically
11 because January 2022, March 2023 is when I was
12 writing the Complaint.

13 And the reason that I struggled
14 with it is because when I write these I end up
15 reliving them. And so the work that was done
16 on the case per se wasn't necessarily about --
17 in therapy about having emotions. It was
18 about dealing with the memories and writing --
19 'cause I wrote the Complaint generally from
20 memory. So dealing the memories of the things
21 that happened and dealing with the details.

22 And that came back again that
23 August of 2022 because -- oh, 2023, I'm sorry,
24 you guys -- because as we discussed, not in

1 the deposition, but the discovery was in a
2 different order. There were conversations.
3 And so basically what I was doing is going
4 into painful things that I could remember,
5 words I could remember, dates I could
6 remember, and then searching for those dates
7 and reconstructing those transcripts.

8 And then when I would do that,
9 I would often think more of suicide, and I
10 would feel terrible about myself. I didn't
11 think I'd be able to do it.

12 So from that time, I think
13 November of 2023, to January where I was able
14 to get out document 40, I was absolutely
15 battling with reading these things and feeling
16 them all over again and feeling like I was
17 there all over again. I think she reckoned it
18 -- or likened it to PTSD.

19 Oftentimes I was told by my
20 therapist to take multiple breaks to practice
21 different coping skills. It was bad. I mean,
22 I was crying in front of my son. It was
23 rough. But, yeah, so that's why I would say
24 that had more to do with those memories in

ASSATA ACEY

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1 that those documents required me to engage
2 with those memories and not necessarily like
3 legal precedent and things like that.

4 Actually, I think that's around
5 the time I started getting medicated for the
6 depression, was around that August, September
7 of 2023, because of those thoughts.

8 Q. Had you ever been diagnosed or
9 have you suffered from major depressive
10 disorder prior to your work at InductEV?

11 A. No.

12 Q. Do you believe or been
13 diagnosed that you suffered from anxiety prior
14 to working at InductEV?

15 A. Yes, generalized anxiety. It
16 was never considered serious enough to pursue
17 treatment, but it was on my file around the
18 time that I got reviewed for attention
19 deficit.

20 Q. I'm going to show you a
21 document that has been marked -- and this way
22 we can refer to it without using it as an
23 exhibit -- in the lower right-hand corner it's
24 Bates stamped with a long word, but the number

1 is 18789, in the lower right-hand corner.

2 And I'll describe it while you
3 look at it. It appears to be notes from your
4 visit with Dr. Mallory. It says June 18 of
5 2022.

6 Do you see that?

7 A. I'm looking for it. Oh, there
8 we are.

9 Q. At the top.

10 A. June 18th. That's interesting.

11 Q. I'm not really worried if the
12 date's the 18th or the 20th, but I do want to
13 go down to the history of present illness.
14 "Patient is 24 years female who presents with
15 complaints of depression and anxiety."

16 Do you see that?

17 A. Yes.

18 Q. "Patient reports managing an
19 illness which has been challenging."

20 A. Yes.

21 Q. It describes, "patient has a
22 pituitary tumor that could impact her vision,"
23 correct?

24 A. Yes.

1 Q. "Patient reports this increases
2 her anxiety since she has a difficult time
3 staying focused at work due to concerns about
4 making a mistake."

5 Do you see that?

6 A. Yes.

7 Q. "Patient reports challenges
8 with medical professionals which have been
9 making her avoid going to the doctor."

10 Do you see that?

11 A. Yes.

12 Q. Did you have some kind of an
13 interaction with a specific male doctor that
14 caused you concerns?

15 A. Not at that time, but -- boy,
16 I'm sorry. I did have a large concern with a
17 male doctor three months after this, but I
18 think I have negative experiences with male --
19 and this is in June. I think I had negative
20 experiences with male and female doctors at
21 this point.

22 Q. "Patient also reports
23 challenges with feeling unsupported at work."

24 Do you see that?

ASSATA ACEY

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1 A. Yes.

2 Q. "Patient reports experiencing
3 mood shifts throughout the day," correct?

4 A. Yes.

5 Q. And in part, if anything I'm
6 telling you is something that you didn't tell
7 her, please let me know.

8 "Patient reports experiencing a
9 deal of traumatic experiences throughout the
10 course of her life."

11 A. Yes.

12 Q. "Patient believes experiencing
13 racial trauma impacts her ability to connect
14 with others."

15 A. Yes.

16 Q. "Patient reports maladaptive
17 coping skills, typically avoidance and
18 sleeping."

19 A. Absolutely. Yes, that is very
20 accurate. I love to avoid people who stress
21 me out.

22 Q. I'm going to give you -- let me
23 give you this packet, Ms. Acey. Those are the
24 notes that have been produced by your --

1 Q. Is it fair to say that if the
2 mediation had resolved the case and the case
3 was over -- and I'm not saying it wasn't --
4 but if the case had stopped at that point you
5 would not have been required to do all these
6 filings and all this work and reliving all
7 these experiences?

8 Is that fair? I mean, there
9 would have been no reason.

10 A. If the case had --

11 Q. If the case -- you know, if
12 there was a -- if the case -- you know, if the
13 case had gone away, it went away. I don't
14 want to get into the semantics about a
15 settlement or not. We'll talk about that.

16 But, you know, if the case
17 wasn't in existence, if your claims and the
18 prosecution of your claim against InductEV did
19 not happen and stopped as of say
20 September 19th of 2022, you would not have
21 experienced what you've been describing as
22 this trauma all this time, the things that you
23 talked with your counselor about, right,
24 related to your work at InductEV. You said

1 working on the case triggers, you know, things
2 for you throughout this counseling.

3 A. I think that I would still feel
4 the symptoms of this, but I think that it may
5 not have continued to be escalated to the
6 point of suicidal ideation. I think that the
7 issue in June would still have occurred, but
8 the issues tracking those episodes after the
9 case had started would not have happened.

10 Q. You wouldn't have needed to go
11 back and review text messages or Teams
12 messages or attempt to develop arguments
13 around your claims if the case had been gone
14 and hadn't continued past the last week in
15 September of 2022, correct?

16 A. Right.

17 Q. Okay. So at a certain level
18 you chose to proceed with your case?

19 A. I did choose to proceed.

20 Q. Right. And in the course of
21 that, resulting in reliving moments that you
22 would prefer not to?

23 THE VIDEOGRAPHER: Your mic
24 dropped.

ASSATA ACEY

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1 THE WITNESS: Oh, I'm sorry.
2 I'm waiting for your mic to go on and
3 my mic is on.

4 So I don't think that the
5 second time of reliving things was my
6 choice. I think that was just the
7 nature of how the evidence was spread
8 out.

9 BY MR. SCHAUER:

10 Q. You were compelled to do it?

11 A. To reorganize it, absolutely,
12 yes.

13 Q. No. You were compelled to
14 continue the case after September of 2022
15 because of, you know -- you know, you had a
16 choice to sign a release and settle the case.

17 You had a choice, correct?

18 A. I did have a choice to sign a
19 release and settle the case.

20 Q. Did you say you did or didn't?

21 A. I did.

22 Q. Okay. And you did and you
23 chose not to?

24 A. Yes, I did.

ASSATA ACEY

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1 Q. Okay. I just want to
2 understand how you viewed this.

3 A. I believed that most of these
4 stressors were not in my control, and I don't
5 believe that they're a standard buy-in to
6 pursuing the case. Actually, I believed at
7 most times that the case would be settled
8 again.

9 Like when I sent the draft of
10 the claim, I think in March 10th or 13th,
11 before filing it I thought they'd read it and
12 say, hey, you know, maybe we should just solve
13 this. I mean, when I rejected the first
14 offer, I think I increased it to like 150,000.
15 I stopped at what I thought would be more
16 fair, and they didn't want to do that. It's
17 not really my problem.

18 Q. Well, you could have chose to
19 accept some number.

20 A. To accept --

21 Q. You didn't want to accept it,
22 correct?

23 A. No, I didn't.

24 Q. So your option was to pursue

1 the case was --

2 A. And if I had not accepted it --

3 Q. You're cutting me off.

4 A. I'm sorry. I'm copying you.

5 What were you saying?

6 Q. You chose not to accept it, and
7 as a result the litigation has ensued. We're
8 here today because the case didn't resolve in
9 the end of September, correct?

10 A. Yes.

11 Q. You had to relive all these
12 moments you talked about, for example,
13 document 40, since that time, correct?

14 A. Well, we're not really here
15 'cause the case didn't settle in September.
16 We're here because I felt that the company was
17 trying to bully me and behaving unethically in
18 their attempt to settle the case. I mean --

19 Q. I'm not getting into the whos
20 and whys and was it a good settlement, not a
21 settlement, and what it should have been
22 settled for.

23 The fact is this case exists
24 because it didn't get resolved at the end of

ASSATA ACEY

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1 September, correct, of 2022?

2 A. No.

3 Q. No?

4 A. If I never thought that I had
5 been bullied or whatever I would not have
6 looked at the laws related to these claims. I
7 would not have filed this suit. I mean,
8 really --

9 Q. What are you talking about?
10 Are you talking about being bullied at the
11 time of the mediation or are you talking about
12 --

13 A. After the mediation -- I mean,
14 she threatened to sue me. I mean, at that
15 point I felt like that was it. Like it has to
16 be -- this needs to be clarified in court.

17 She said if I didn't remove my
18 EEOC -- even if I let the EEOC continue their
19 investigation she said whatever the EEOC did,
20 any inconvenience it caused the company, she
21 was going to pursue me legally for it. That's
22 what the e-mail said.

23 Q. Did she ever file a complaint
24 against you?

16 related to my stuff. But I just figured, you
17 know what, if they can do this, then I'll just
18 ignore the fact of the stuff that they're
19 doing right now and we'll just be gone.

20 Q. So when you agreed on the
21 \$50,000, there was no --

22 A. Are we going to continue to
23 object to that question?

24 Q. Go ahead. You can, you can.

ASSATA ACEY

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1 I'll read it from your e-mail each time if you
2 would like, but that's going to be very
3 cumbersome.

4 A. It was from the mediation.

5 - - -

6 (The court reporter requests
7 that the parties do not speak
8 simultaneously.)

9 - - -



10 Q. And do you have any direct
11 evidence of that or is it mostly inferred?

12 A. Mostly circumstantial, yes.

13 Q. And that would be, as we
14 discussed last time, given facts and
15 circumstances and Diana Wilmes' position and
16 reasonable level of intelligence, you believe
17 that because she did what she did and you
18 think that here, you know, it's not
19 appropriate or you didn't like it, it's
20 reflective then of some kind of racial or
21 gender animus; is that correct?

22 A. I think that's noncorrect. I
23 think in this case it has more to do with how
24 she treated other coworkers. When I was

ASSATA ACEY

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1 comparing, when I took my aspirins, and even
2 my teammates, former teammates, nobody had
3 been -- complained, remembered being
4 complained about by Diana for those small
5 things she complained about me.

6 Q. Well, she checked with your
7 boss; isn't that correct?

8 That's what she did; is that
9 right?

10 A. Yes.

11 Q. Okay. Does any of that show up
12 in your evaluation review? Do you recall
13 being dinged for missing meetings? No, you
14 didn't. You weren't, were you?

15 A. You know what I thought or I
16 recall. I'm sorry, Attorney Schauer, I don't
17 think it's appropriate --

18 Q. I'll strike the question. I'll
19 strike the question. It's getting long in the
20 day. Okay.

**PTE 110 (04/18/2024 A. Acey Dep. Video cc
10:59:29-11:02:57, 11:12:41-11:19:09,
11:36:00-11:37:17, 11:54:05-11:54:34,
3:00:00-3:01:50).**

This Exhibit is Produced outside of the
Appendix

PTE 111 (08/28/2024 Defendant Email).



Assata Acey <aceyassata@gmail.com>

Subpoenas for trial

Schauer, Randall C. <RSchauer@foxrothschild.com>


28 August 2024 at 16:34

To: Assata Acey <aceyassata@gmail.com>

Cc: "Longo, Alberto" <ALongo@foxrothschild.com>, "Hanley, Krista M." <KHanley@foxrothschild.com>

Ms. Acey: Thank you for sending.

If your failure to create a new position to your liking, promote, hire claims survive

A large, solid black rectangular area covering the majority of the page below the text, indicating that the content has been redacted.

PTE 112 (03/27/2024 J. Acey Dep. pp. 50-51).

JACQUELINE ACEY

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1 A. Yes.

2 Q. When's the last time she reached
3 out to talk to you about this case?

4 A. When you've upset her.

5 Q. What was that?

6 A. When you have upset her.

7 Q. When was that?

8 A. I think the last time you had a
9 meeting you were yelling at her or something and
10 she was upset about that.

11 Q. How did she reach out? Was it over
12 the phone? She called you?

13 A. It was over the phone.

14 Q. What did she tell you?

15 A. That you yelled at her and she was,
16 you know, sick and she was depressed and she was
17 very upset.

18 Q. When she said you, did she identify
19 who she was referring to?

20 A. You. She was referring to you, the
21 lawyer.

22 Q. Me?

23 A. Yes.

24 Q. What did she tell you?

JACQUELINE ACEY

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1 A. I just listen. I listen to
2 Assata. She talks and I listen to how she feels.
3 She's talking it out.

4 Q. You don't respond to her at all?
5 You don't tell her --

6 A. What can I say, not my case. I'm
7 not a lawyer.

8 Q. Do you ever say, you know, Assata
9 it's going to be okay or do you offer any type of
10 response to what she's saying other than just
11 listening?

12 A. I think I said that you should not
13 take a meeting. That you should do everything in
14 the legal setting and maybe yelling would not
15 occur.

16 Q. Do you use any type of social media
17 page?

18 A. I have a Facebook page, but I don't
19 really use it. Mostly, I just send happy
20 birthdays to people that I'm friends with. I
21 don't post much. I think no, not much at all.

22 Q. And you wouldn't have posted about
23 anything here, right?

24 A. Absolutely not.

PTE 113 (04/09/2024 D. Hackman Dep. p. 93).

**All evidence listed on page 1 of Doc 92-2 (appendix of Doc 92 motion for partial Summary judgement) is also intended to be presented at trial with exhibits 1-17 becoming PTE 114-PTE 130 respectively, (with Ex 1 of Doc 92 starting as PTE 114).*

DANIEL HACKMAN

Page 93

1 She talked about, I mean, a whole
2 manner of things. She has talked about how --
3 she's talked about how she sometimes receives
4 emails from Defendant's counsel that she thinks
5 are kind of mean; I guess. You know, she told me
6 one time I think that it was during a phone call
7 that she had with -- I think it was probably with
8 Attorney Schauer she said that, you know, he was,
9 like, raising his voice at her and that made her
10 really upset.

11 Those are -- those are the examples
12 that come to mind.


13 Q. And what do you tell her when Ms. Acey
14 gives you these examples?

15 A. I tell her that -- that it's
16 unfortunate. That's -- and I tell her that it's
17 unfortunate that it's too bad, that I'm sorry
18 she's having to deal with all of this stuff. I
19 tell her that I'm going to be there for her. That
20 I love her, that I support her, and that we'll get
21 through it.

22 Q. Do you ever encourage her to take
23 certain actions with respect to Defendant or
24 counsel for Defendant?

**PTE 114 (Defendant's Production,
INDUCTEV INITDISCL019275.xlsx).**

	A	B	C	D	E	F
1	Job Title	Department	Incumbent Name	Last Name	Incumbent Salary	Salary Range/ Mid Point
2	PCB Designer, R&D Projects	Operations			\$ 85,000	\$ 80,000
3	IP Manager	Operations			\$ 168,680	\$ 150,000
4	Senior R&D Designer	Operations			\$ 102,805	\$ 100,000
5	Senior Electronics Technician	Operations			\$ 74,963	\$ 80,000
6	Sr. Systems & Compliance Eng	Operations			\$ 95,000	\$ 125,000
7	Technician	Operations			\$ 72,716	\$ 70,000
8	Electrical Engineer (II)	Operations			\$ 77,100	\$ 100,000
9	Principal Research Engineer	Operations			\$ 168,071	\$ 150,000
10	Senior CAD Technician	Operations			\$ 65,625	\$ 80,000
11	Senior RF Technician	Operations			\$ 43,680	\$ 80,000
12	Principal Embedded SW Engin	Operations			\$ 135,637	\$ 150,000
13	Principial Design EGINEER	Operations			\$ 154,534	\$ 150,000
14	Lead Technician	Operations			\$ 80,000	\$ 100,000
15	CHIEF SCIENTIST	Operations			\$ 150,000	\$ 150,000

	G	H	I	J
1	Proposed Increase Amount		Proposed or Current Salary	Salary Grade
2				3
3				6
4				4
5				3
6				5
7				2
8				4
9				6
10				3
11				3, part time
12				7
13				6
14				4
15				6